

THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION

UNITED STATES OF AMERICA

PLAINTIFF,

*v.*

THE REAL PROPERTY LOCATED  
AT 225 VALLEY ROAD, N.W.,  
ATLANTA, FULTON COUNTY, GA  
30305, ET. AL,

and

APPROXIMATELY 8,671,456,050 IN  
IRAQI DINARS, ET. AL,

Defendants.

CIVIL ACTION NOS.

1:15-CV-2032-LMM

1:15-CV-2677-LMM

**PLAINTIFF'S MOTION TO LIFT STAY FOR THE LIMITED PURPOSE OF  
FILING AMENDED COMPLAINTS AND REQUEST FOR LEAVE TO FILE  
AMENDED COMPLAINTS**

COMES NOW the United States of America, Plaintiff in the above-styled civil forfeiture actions, and moves this Court pursuant to Federal Rule of Civil Procedure 15(a)(2) for leave to file Amended Complaints for Forfeiture. The respective proposed Amended Complaint for Forfeiture for each of the above-

styled civil forfeiture actions is attached to this motion. In support of its motion, Plaintiff shows the Court the following:

## **I. Background**

### **1.**

On June 9, 2015, Plaintiff filed an Amended Complaint for Forfeiture<sup>1</sup> seeking forfeiture of various real properties, vehicles, airplanes, and entities owned or controlled by Sterling and its owners and agents, pursuant to 18 U.S.C. § 981(a)(1)(C) as proceeds of specified unlawful activity traceable directly or indirectly to violations of 18 U.S.C. §§ 1341, 1343, 1349, 1956, and 1957 and pursuant to 18 U.S.C. § 981(a)(1)(A) as property involved in money laundering offenses in violation of 18 U.S.C. §§ 1956 and 1957. [*United States v. 225 Valley Road, Atlanta, Fulton County, Georgia, et al.*, NDGa., Civil Action No. 1:15-CV-2032-LMM (hereafter “Sterling 1”), at Doc. 2].

Subsequently, on July 29, 2015, the Government filed a related Complaint for Forfeiture against various foreign currencies (including Iraqi dinar), bank

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<sup>1</sup> This action initially commenced with the Government’s filing a Complaint for Forfeiture on June 5, 2015, which was amended a few days later, pursuant to Federal Rule of Civil Procedure 15(a)(1)(A). [Doc. 1].

accounts, cash, and coins, seeking forfeiture on the same grounds as Sterling 1. [*United States v. 8,671,456,050 in Iraqi Dinars, et al.*, NDGa., Civil Action No. 1:15-CV-2677-LMM (hereafter “Sterling 2”), at Doc. 1]. The Sterling 2 complaint has not been previously amended.

2.

Plaintiff has served Notices of Complaints for Forfeiture on all known, potential claimants to both actions, and several individuals and entities have filed verified claims and answers. [*E.g.*, Sterling 1, Docs. 23-26, 28-29, 34, 148-149, 152-155; Sterling 2, Docs. 107-109, 114-116, 118-119]. The statutory deadline to file a claim in either civil forfeiture action expired many months ago.

3.

On September 25, 2015, the United States moved the Court, pursuant to 18 U.S.C. § 981(g)(1), for a stay of these civil forfeiture actions. [Sterling 1, Doc. 179; Sterling 2, Doc. 148]. The United States advised that it was conducting a criminal investigation that was related to the civil forfeiture actions. In particular, the United States argued that engaging in civil discovery would interfere with the ongoing criminal investigation because the same facts which gave rise to the civil forfeiture complaints were the basis of the criminal investigation. On October 14, 2015, the Court ordered both of the above-styled civil forfeiture actions stayed

pending the outcome of the criminal investigation. [Sterling 1, Doc. 190; Sterling 2, Doc. 166].

4.

On February 10, 2016, a Grand Jury sitting in the Northern District of Georgia returned an Indictment charging Tyson Rhame, James Shaw, Frank Bell, and Terrence Keller with various counts of mail fraud, wire fraud, and/or money laundering. [See, *United States v. Rhame, et al.*, NDGa., Criminal Action No. 1:16-CR-67, at Doc. 1]. This Indictment was unsealed earlier today. Rhame, Shaw, and Bell have filed numerous claims in both civil forfeiture actions.

## II. Legal Argument

### *Basis for Amending Complaints*

5.

Under Federal Rules of Civil Procedure Rule 15(a)(2), a pleading may be amended prior to trial either with the written consent of the opposing party or leave of the court. Fed. R. Civ. P. 15(a)(2). The statute specifies, “The court should freely give leave when justice so requires.” *Id.* The United States seeks to amend both of the above-styled complaints for forfeiture.

6.

As to Sterling 1, the United States seeks to file a Second Amended Verified Complaint for Forfeiture to remove defendants *in rem* from the properties subject to forfeiture and to incorporate additional factual allegations. The Amended Complaint for Forfeiture currently lists Gvest Capital, LLC; Gvest Partners, LLC; and Gvest Holdings, LLC (collectively, "Gvest"), as properties subject to forfeiture. [Sterling 1, Doc. 2]. More specifically, the complaint for forfeiture seeks to forfeit Shaw's, Rhame's, Bell's, and several associated entities' right, title, and interest in Gvest. [*Id.*]. Through additional investigation, the United States has determined that neither Shaw, Rhame, Bell, nor their associated entities possess a right, title, or interest in Gvest; therefore, the United States no longer seeks forfeiture of Gvest. The United States respectfully requests leave to file an amended complaint removing all references to Gvest. The complaint should be amended now, rather than waiting for the stay to be lifted at the conclusion of the criminal prosecution, to prevent Gvest from suffering any hardships as a result of being named in a civil forfeiture complaint.

7.

As to Sterling 2, the United States seeks to file an Amended Verified Complaint for Forfeiture to correct the amount of money seized from one of the

defendant *in rem* bank accounts and to incorporate additional factual allegations. Before filing a complaint for forfeiture in Sterling 2, the United States agreed to release certain seized funds from bank account XXXXXX5536, which had been previously seized. Specifically, the United States agreed to release \$52,195.55 to pay Altus GTS, Inc., and \$35,723.26 to ADP, LLC. [Sterling 1, Doc. 31 at 11]. Accordingly, when the United States filed its Complaint for Forfeiture in Sterling 2, the government only sought to forfeit the remaining funds in bank account XXXXXX5536. [See, Sterling 2, Doc. 1]. Shortly thereafter, ADP, LLC reduced some of the fees related to its payment, and the Court ordered that the United States instead release \$16,668.63 from bank account XXXXXX5536 to pay ADP, LLC. [Sterling 2, Doc. 106]. Because of the reduction in the amount paid to ADP, the United States seeks to amend the complaint for forfeiture to include the full balance of bank account XXXXXX5536, \$40,516.12. Counsel for Rhame, Shaw, Bell, and Sterling advised via email on September 4, 2015, that they would not object to the United States later amending the complaint to correct the balance of seized funds in bank account XXXXXX5536.

8.

The United States further seeks to amend both complaints for forfeiture to modify certain factual allegations. The investigation is now complete and has

resulted in a criminal indictment. Based upon that completed investigation, the amended complaint removes certain emails or allegations, modifies certain allegations, provides complete emails for the record, and corrects typographical errors.

*The stay should be lifted only for the limited purpose of filing the amended complaints*

9.

Title 18, United States Code, Section 981(g) provides for the stay of a civil forfeiture case pending the conclusion of a criminal investigation or trial. Section 981(g)(1) states, “[u]pon the motion of the United States, the court *shall* stay the civil forfeiture proceeding if the court determines that civil discovery will adversely affect the ability of the Government to conduct a related criminal investigation or the prosecution of a related criminal case. 18 U.S.C. § 981(g)(1) (emphasis added).

10.

As indicated, the prosecution of a related criminal case against Rhame, Shaw, and Bell is pending. The conditions requiring stays of the civil forfeiture actions remain unchanged and engaging in civil discovery at this juncture would not only undermine the criminal prosecution but also burden the criminal

defendants' Fifth Amendment right against self-incrimination. Title 18, United States Code, Sections 981(g)(1) and (2) specifically guard against such a result and require that the civil forfeiture actions remain stayed.

11.

Under Federal Rule of Civil Procedure, Supplemental Rules for Admiralty or Maritime Claims and Asset Forfeiture Actions Rule G, after the United States files a complaint for forfeiture, it must serve notice on all known, potential claimants. The United States submits that since the civil forfeiture actions will remain stayed, the United States will not begin serving notices of the amended complaints for forfeiture until the Court lifts the stays at the conclusion of the related criminal prosecution. Therefore, claimants will not be required to file a claim or answer to the amended complaints until after the stays are lifted and the United States gives them notice. Allowing the United States to file amended complaints while the civil forfeiture actions are stayed will not disadvantage any of the known, potential claimants. To the contrary, because the United States seeks to remove defendants *in rem* from Sterling 1, the amended complaint decreases the number of known, potential claimants, rather than expanding the number. As well, in Sterling 2, the United States seeks to correct the amount of money seized from a bank account. The claimants to this bank account would



remain the same, and indeed, the counsel for the Claimants Rhame, Shaw, Bell, and Sterling advised that they would not oppose the United States amending the complaint to correct this amount. Accordingly, the Court should lift the stay for the limited purpose of filing the amended complaints but leave intact its Order staying the proceedings.

### **III. Conclusion**

12.

WHEREFORE, on the basis of the authorities presented herein and the existence of a related criminal prosecution, the United States respectfully requests this Court grant the United States leave to file amended complaints in both above-styled civil forfeiture actions, while these actions remain stayed. At the conclusion of the related criminal prosecution and the lifting of the stay, the United States will provide notice of the amended complaints for forfeiture to all known, potential claimants, in accordance with Supplemental Rule G, and the time for any potential claimant to file a verified claim will not commence until

the United States serves notice of the amended complaints.

Respectfully submitted,

JOHN A. HORN

*United States Attorney*

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/s/KELLY K. CONNORS

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**Certificate of Compliance**

I hereby certify, pursuant to Local Rules 5.1 and 7.1D, that the foregoing brief has been prepared using Book Antiqua, 13 point font.

/s/KELLY K. CONNORS

*Assistant United States Attorney*

**Certificate of Service**

The United States Attorney's Office served this document today by filing it using the Court's CM/ECF system, which automatically notifies the parties and counsel of record.

February 22, 2016

/s/ KELLY K. CONNORS

KELLY K. CONNORS

*Assistant United States Attorney*

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION

UNITED STATES OF AMERICA,

v.

Civil Action No.

1:15-CV-2677

APPROXIMATELY 8,671,456,050 IN  
IRAQI DINARS;  
APPROXIMATELY 13,317,698,200 IN  
VIETNAMESE DONGS;  
APPROXIMATELY 2,100 IN  
AFGHANIS;  
APPROXIMATELY 100 IN CHINESE  
YUAN;  
APPROXIMATELY 1,600,000 IN  
INDONESIAN RUPIAHS;  
APPROXIMATELY 29 SILVER COINS;  
APPROXIMATELY 14,396,403 IN IRAQI  
DINARS;  
APPROXIMATELY 20,000 IN  
VIETNAMESE DONGS;  
APPROXIMATELY 150,000 IN BANK  
OF MOZAMBIQUE NOTES;  
APPROXIMATELY 23,200 IN BANK OF  
EGYPT NOTES;  
APPROXIMATELY 1,000 IN UNION OF  
BURMA BANK NOTES;  
APPROXIMATELY 1,000,000 IN  
REPUBLIC OF IRAN BANK NOTES;  
APPROXIMATELY 9,799 IN CHINESE  
YUAN;  
APPROXIMATELY 1,502,600 IN  
AFGHANIS;  
APPROXIMATELY 2,450 IN BANK OF  
SURINAME NOTES;

APPROXIMATELY 9,300 IN BANK OF  
YUGOSLAVIA NOTES;  
APPROXIMATELY 155,000 IN  
CAMBODIAN BANK NOTES;  
APPROXIMATELY 500 IN BRAZILIAN  
CURRENCY;  
APPROXIMATELY 1,000 IN BANK OF  
SUDAN NOTES;  
APPROXIMATELY 182 GOLD COINS;  
APPROXIMATELY 49 SILVER COINS;  
APPROXIMATELY \$48,718.00 IN  
UNITED STATES CURRENCY;  
APPROXIMATELY \$1,826,973.89  
SEIZED FROM BANK ACCOUNT  
XXXX001-75;  
APPROXIMATELY \$200,000.00 SEIZED  
FROM BANK ACCOUNT XXXX01-76;  
APPROXIMATELY \$45,183.75 SEIZED  
FROM BANK ACCOUNT XXXX01-99;  
APPROXIMATELY \$6,321.47 SEIZED  
FROM BANK ACCOUNT XXXX02-75;  
APPROXIMATELY \$105,193.25 SEIZED  
FROM BANK ACCOUNT XXXX02-76;  
APPROXIMATELY \$42,848.25 SEIZED  
FROM BANK ACCOUNT XXXX02-99;  
APPROXIMATELY \$5,953,182.45  
SEIZED FROM BANK ACCOUNT  
XXX-XX113-9;  
APPROXIMATELY \$5,941,436.00  
SEIZED FROM BANK ACCOUNT  
XXX-X9613;  
APPROXIMATELY \$760,456.50 SEIZED  
FROM BANK ACCOUNT  
XXXXXX8418;  
APPROXIMATELY \$174,774.29 SEIZED  
FROM BANK ACCOUNT XXX-X0471;  
APPROXIMATELY \$155,872.08 SEIZED

FROM BANK ACCOUNT XXX-X0478;  
APPROXIMATELY \$155,632.14 SEIZED  
FROM BANK ACCOUNT XXX-X0479;  
APPROXIMATELY \$156,016.05 SEIZED  
FROM BANK ACCOUNT XXX-X0480;  
APPROXIMATELY \$3.34 SEIZED  
FROM BANK ACCOUNT XXX-X0488;  
APPROXIMATELY \$100,002.56 SEIZED  
FROM BANK ACCOUNT XXX-X1015;  
APPROXIMATELY \$2,480,140.95  
SEIZED FROM BANK ACCOUNT  
XXX-X2048;  
APPROXIMATELY \$308,423.79 SEIZED  
FROM BANK ACCOUNT XXX-X2049;  
APPROXIMATELY \$146,683.66 SEIZED  
FROM BANK ACCOUNT XXX-X2050;  
APPROXIMATELY \$141,030.48 SEIZED  
FROM BANK ACCOUNT XXX-X2062;  
APPROXIMATELY \$912,058.77 SEIZED  
FROM BANK ACCOUNT XXX-X2065;  
APPROXIMATELY \$4,276,752.09  
SEIZED FROM BANK ACCOUNT  
XXX-X2066;  
APPROXIMATELY \$548,084.32 SEIZED  
FROM BANK ACCOUNT XXX-X2072;  
APPROXIMATELY \$4,708,955.32  
SEIZED FROM BANK ACCOUNT  
XXX-X2087;  
APPROXIMATELY \$233,502.69 SEIZED  
FROM BANK ACCOUNT XXX-X2089;  
APPROXIMATELY \$217,292.68 SEIZED  
FROM BANK ACCOUNT XXX-X2386;  
APPROXIMATELY \$5,174,942.68  
SEIZED FROM BANK ACCOUNT  
XXX-X2391;  
APPROXIMATELY \$318,546.39 SEIZED  
FROM BANK ACCOUNT XXX-X2421;

APPROXIMATELY \$13,424.15 SEIZED  
FROM BANK ACCOUNT XXX-X2426;  
APPROXIMATELY \$14,231.03 SEIZED  
FROM BANK ACCOUNT  
XXXXXX0235;  
APPROXIMATELY \$25,260.98 SEIZED  
FROM BANK ACCOUNT  
XXXXXX8724;  
APPROXIMATELY \$246.85 SEIZED  
FROM BANK ACCOUNT  
XXXXXXXXXX0477;  
APPROXIMATELY \$66,312.33 SEIZED  
FROM BANK ACCOUNT  
XXXXXXXXXX7073;  
APPROXIMATELY \$115,774.55 SEIZED  
FROM BANK ACCOUNT  
XXXXXXXXXX7380;  
APPROXIMATELY \$2,873,324.89  
SEIZED FROM BANK ACCOUNT  
XXX-XX3551;  
APPROXIMATELY \$508,431.62 SEIZED  
FROM BANK ACCOUNT XXX-XX5715;  
APPROXIMATELY \$3,106,534.41  
SEIZED FROM BANK ACCOUNT  
XXX-XX5720;  
APPROXIMATELY \$8.21 SEIZED  
FROM BANK ACCOUNT XXX-XX7569;  
APPROXIMATELY \$72.61 SEIZED  
FROM BANK ACCOUNT  
XXXXX-X184-2;  
APPROXIMATELY \$104,336.14 SEIZED  
FROM BANK ACCOUNT XXX-X327-2;  
APPROXIMATELY \$1,041,448.99  
SEIZED FROM BANK ACCOUNT  
XXXX4008;  
APPROXIMATELY \$3,043,242.98  
SEIZED FROM BANK ACCOUNT



XXXX8860;  
APPROXIMATELY \$3,000.00 SEIZED  
FROM BANK ACCOUNT  
XXXXXX0124;  
APPROXIMATELY \$36,200.72 SEIZED  
FROM BANK ACCOUNT  
XXXXXX0132;  
APPROXIMATELY \$30,843.89 SEIZED  
FROM BANK ACCOUNT  
XXXXXX0165;  
APPROXIMATELY \$126.02 SEIZED  
FROM BANK ACCOUNT  
XXXXXX0199;  
APPROXIMATELY \$94,635.98 SEIZED  
FROM BANK ACCOUNT  
XXXXXX0223;  
APPROXIMATELY \$9,787.45 SEIZED  
FROM BANK ACCOUNT  
XXXXXX0231;  
APPROXIMATELY \$1,297.77 SEIZED  
FROM BANK ACCOUNT  
XXXXXX0280;  
APPROXIMATELY \$13,961.39 SEIZED  
FROM BANK ACCOUNT  
XXXXXX0298;  
APPROXIMATELY \$293,814.26 SEIZED  
FROM BANK ACCOUNT  
XXXXXX0371;  
APPROXIMATELY \$9,940.00 SEIZED  
FROM BANK ACCOUNT  
XXXXXX0397;  
APPROXIMATELY \$37,878.22 SEIZED  
FROM BANK ACCOUNT  
XXXXXX0496;  
APPROXIMATELY \$22,797.65 SEIZED  
FROM BANK ACCOUNT  
XXXXXX0579;

APPROXIMATELY \$37,015.37 SEIZED  
FROM BANK ACCOUNT  
XXXXXX2673;  
APPROXIMATELY \$99,970.00 SEIZED  
FROM BANK ACCOUNT  
XXXXXX2681;  
APPROXIMATELY \$201,572.39 SEIZED  
FROM BANK ACCOUNT  
XXXXXX2821;  
APPROXIMATELY \$178,791.99 SEIZED  
FROM BANK ACCOUNT  
XXXXXX2839;  
APPROXIMATELY \$85,038.93 SEIZED  
FROM BANK ACCOUNT  
XXXXXX2850;  
APPROXIMATELY \$122,487.52 SEIZED  
FROM BANK ACCOUNT  
XXXXXXXXXX3245;  
APPROXIMATELY \$38,036.83 SEIZED  
FROM BANK ACCOUNT  
XXXXXX3808;  
APPROXIMATELY \$1,597,831.09  
SEIZED FROM BANK ACCOUNT  
XXXXXX4675;  
APPROXIMATELY \$77,676.58 SEIZED  
FROM BANK ACCOUNT  
XXXXXX4767;  
APPROXIMATELY \$50,048.42 SEIZED  
FROM BANK ACCOUNT  
XXXXXX5133;  
APPROXIMATELY \$1,201,546.95  
SEIZED FROM BANK ACCOUNT  
XXXXXX5439;  
APPROXIMATELY \$40,516.12 SEIZED  
FROM BANK ACCOUNT  
XXXXXX5536;  
APPROXIMATELY \$114,187.52 SEIZED

FROM BANK ACCOUNT  
XXXXXX5551;  
APPROXIMATELY \$43,132.68 SEIZED  
FROM BANK ACCOUNT  
XXXXXX6320;  
APPROXIMATELY \$1,611.81 SEIZED  
FROM BANK ACCOUNT XXXX-6797;  
APPROXIMATELY \$158,010.36 SEIZED  
FROM BANK ACCOUNT  
XXXXXX7400;  
APPROXIMATELY \$8,796.58 SEIZED  
FROM BANK ACCOUNT XXXX-7939;  
APPROXIMATELY \$139,577.61 SEIZED  
FROM BANK ACCOUNT  
XXXXXX8032;  
APPROXIMATELY \$79,896.51 SEIZED  
FROM BANK ACCOUNT  
XXXXXX8575;  
APPROXIMATELY \$16,882.82 SEIZED  
FROM BANK ACCOUNT  
XXXXXX8594;  
APPROXIMATELY \$61,854.65 SEIZED  
FROM BANK ACCOUNT  
XXXXXX8658;  
APPROXIMATELY \$39,597.41 SEIZED  
FROM BANK ACCOUNT  
XXXXXX8674; AND  
APPROXIMATELY \$44,405.30 SEIZED  
FROM BANK ACCOUNT  
XXXXXX9969.

**AMENDED VERIFIED COMPLAINT FOR FORFEITURE**

COMES NOW, the United States of America, the Plaintiff in this matter, by  
John A. Horn, United States Attorney the Northern District of Georgia, and  
Thomas J. Krepp and Kelly K. Connors, Assistant United States Attorneys, and

files this Complaint for Forfeiture. In support thereof, the United States shows the following:

### **I. Introduction**

1. This Complaint seeks forfeiture of the below-listed properties to the United States as proceeds of specified unlawful activities and properties involved in money laundering offenses of Sterling Currency Group, LLC ("Sterling"); Sterling Online Processing Services, LLC (Sterling Online); GID Partners, LLC (GID); Alex Capital Holdings LLC (Alex); James Shaw (J.Shaw); Carole Laurette Shaw (C.Shaw); Tyson Rhame (Rhame); Frank Bell (Bell), and other entities controlled by these same businesses and individuals that have used the facilities of interstate commerce in a scheme to defraud investors in the Iraqi dinar by publishing and disseminating false information about the viability of that currency as an investment:

- a. A total of approximately 8,671,456,050 in Iraqi dinar seized from 2751 Buford Highway, #403, Atlanta, Georgia on June 3, 2015;
- b. A total of approximately 13,317,698,200 in Vietnamese Dong seized from 2751 Buford Highway, #403, Atlanta, Georgia on June 3, 2015;
- c. A total of approximately 2,100 in Afghanis seized from 2751 Buford Highway, #403, Atlanta, Georgia on June 3, 2015;
- d. A total of approximately 100 in Chinese Yuan seized from 2751 Buford Highway, #403, Atlanta, Georgia on June 3, 2015;

- e. A total of approximately 1,600,000 in Indonesian Rupiahs seized from 2751 Buford Highway, #403, Atlanta, Georgia on June 3, 2015;
- f. Approximately 29 silver coins seized from 2751 Buford Highway, #403, Atlanta, Georgia on June 3, 2015;
- g. A total of approximately 14,396,403 in Iraqi dinar seized from 4536 East Brookhaven Drive, Atlanta, Georgia on June 3, 2015;
- h. A total of approximately 20,000 in Vietnamese Dong seized from 4536 East Brookhaven Drive, Atlanta, Georgia on June 3, 2015;
- i. A total of approximately 150,000 in Bank of Mozambique notes seized from 4536 East Brookhaven Drive, Atlanta, Georgia on June 3, 2015;
- j. A total of approximately 23,200 in Bank of Egypt notes seized from 4536 East Brookhaven Drive, Atlanta, Georgia on June 3, 2015;
- k. A total of approximately 1,000 in Union of Burma bank notes seized from 4536 East Brookhaven Drive, Atlanta, Georgia on June 3, 2015;
- l. A total of approximately 1,000,000 in Republic of Iran bank notes seized from 4536 East Brookhaven Drive, Atlanta, Georgia on June 3, 2015;

- m. A total of approximately 9,799 in Chinese Yuan seized from 4536 East Brookhaven Drive, Atlanta, Georgia on June 3, 2015;
- n. A total of approximately 1,502,600 in Afghanis seized from 4536 East Brookhaven Drive, Atlanta, Georgia on June 3, 2015;
- o. A total of approximately 2,450 in Bank of Suriname notes seized from 4536 East Brookhaven Drive, Atlanta, Georgia on June 3, 2015;
- p. A total of approximately 9,300 in Bank of Yugoslavia notes seized from 4536 East Brookhaven Drive, Atlanta, Georgia on June 3, 2015;
- q. A total of approximately 155,000 in Cambodian Bank notes seized from 4536 East Brookhaven Drive, Atlanta, Georgia on June 3, 2015;
- r. A total of approximately 500 in Brazilian currency seized from 4536 East Brookhaven Drive, Atlanta, Georgia on June 3, 2015;
- s. A total of approximately 1,000 in Bank of Sudan notes seized from 4536 East Brookhaven Drive, Atlanta, Georgia on June 3, 2015;
- t. Approximately 182 gold coins seized from 4536 East Brookhaven Drive, Atlanta, Georgia on June 3, 2015;

- u. Approximately 49 silver coins seized from 4536 East Brookhaven Drive, Atlanta, Georgia on June 3, 2015;
- v. Approximately \$48,718.00 in United States currency seized from 4536 East Brookhaven Drive, Atlanta, Georgia on June 3, 2015;
- w. Funds in the below listed amounts seized from the following accounts:

Amount/ Value Seized	Bank Name	Account # <sup>1</sup>	Held in the Name of	Authorized Signatories	Date Opened	Referenced hereinafter as
\$1,826,973.89	Actors Federal Credit Union	XXXX001-75	Sterling Currency Group	Tyson Rhame James Shaw Frank Bell	10/10/2013	ACT #1-75
\$200,000.00	Actors Federal Credit Union	XXXX01-76	Sterling Currency Group	Tyson Rhame James Shaw Frank Bell	10/10/2013	ACT #1-76
\$45,183.75	Actors Federal Credit Union	XXXX01-99	Sterling Currency Group	Tyson Rhame James Shaw Frank Bell	10/10/2013	ACT #1-99
\$6,321.47	Actors Federal Credit Union	XXXX02-75	Sterling Currency Group	Tyson Rhame James Shaw Frank Bell	10/10/2013	ACT #2-75
\$105,193.25	Actors Federal Credit Union	XXXX02-76	Sterling Currency Group	Tyson Rhame James Shaw Frank Bell	10/10/2013	ACT #2-76
\$42,848.25	Actors Federal Credit Union	XXXX02-99	Sterling Currency Group	Tyson Rhame James Shaw Frank Bell	10/10/2013	ACT #2-99
\$5,953,182.45	Goldman Sachs and Co.	XXX-XX113-9	Spring Lake Trading LLC	James Shaw	08/18/2014	GS #113-9
\$5,941,436.00	J.P. Morgan Chase	XXX-X9613	JS Real Estate Investments LLC	James Shaw	Unknown	JPMC #9613

<sup>1</sup> Although full account numbers and the names of minors and third parties have been redacted to comply with the local rules, the United States will file a Motion seeking the Court's permission to file the above spreadsheet without the redactions under seal so that the record is complete.

Amount/ Value Seized	Bank Name	Account # <sup>1</sup>	Held in the Name of	Authorized Signatories	Date Opened	Referenced hereinafter as
\$760,456.50	Mahopac National Bank	XXXXXX8418	Sterling Currency Group	Tyson Rhame Frank Bell	5/1/2012	MNB #8418
\$174,774.29	Merrill Lynch	XXX-X0471	James Shaw	James Shaw Carole Shaw	4/20/2012	ML #0471
\$155,872.08	Merrill Lynch	XXX-X0478	James Shaw custodian for E.S.	James Shaw	4/20/2012	ML #0478
\$155,632.14	Merrill Lynch	XXX-X0479	James Shaw custodian for A.S.	James Shaw	4/20/2012	ML #0479
\$156,016.05	Merrill Lynch	XXX-X0480	James Shaw custodian for C.S.	James Shaw	4/20/2012	ML #0480
\$3.34	Merrill Lynch	XXX-X0488	James & Carole Shaw	James Shaw Carole Shaw	4/20/2012	ML #0488
\$100,002.56	Merrill Lynch	XXX-X1015	Tyson Rhame	Tyson Rhame	01/01/2014	ML #1015
\$2,480,140.95	Merrill Lynch	XXX-X2048	Curtis Creek Holdings, LLC	James Shaw	4/24/2012	ML #2048
\$308,423.79	Merrill Lynch	XXX-X2049	Alex Capital Holdings, LLC	Tyson Rhame James Shaw	4/24/2012	ML #2049
\$146,683.66	Merrill Lynch	XXX-X2050	JS Real Estate Investments, LLC	James Shaw	4/24/2012	ML #2050
\$141,030.48	Merrill Lynch	XXX-X2062	Lullwater Holdings, LLC	Tyson Rhame	5/6/2012	ML #2062
\$912,058.77	Merrill Lynch	XXX-X2065	Curtis Creek Holdings, LLC	James Shaw	6/27/2012	ML #2065
\$4,276,752.09	Merrill Lynch	XXX-X2066	Curtis Creek Holdings, LLC	James Shaw	6/27/2012	ML #2066
\$548,084.32	Merrill Lynch	XXX-X2072	Curtis Creek Holdings, LLC	James Shaw	6/27/2012	ML #2072
\$4,708,955.32	Merrill Lynch	XXX-X2087	Curtis Creek Holdings, LLC	James Shaw	6/26/2012	ML #2087
\$233,502.69	Merrill Lynch	XXX-X2089	Curtis Creek Holdings, LLC	James Shaw	6/26/2012	ML #2089
\$217,292.68	Merrill Lynch	XXX-X2386	SR Equipment Leasing, LLC	James Shaw Tyson Rhame	12/5/2013	ML #2386
\$5,174,942.68	Merrill Lynch	XXX-X2391	Primestone Properties, LLC	James Shaw	7/1/2014	ML #2391



Amount/ Value Seized	Bank Name	Account # <sup>1</sup>	Held in the Name of	Authorized Signatories	Date Opened	Referenced hereinafter as
\$318,546.39	Merrill Lynch	XXX-X2421	Springlake Trading, LLC	James Shaw	8/12/2014	ML #2421
\$13,424.15	Merrill Lynch	XXX-X2426	SR Equipment Leasing LLC	Tyson Rhame James Shaw	11/29/2014	ML #2426
\$14,231.03	Regions Bank	XXXXXX0235	Sterling Online Processing Services, LLC	Frank Bell	3/17/2011	REG #0235
\$25,260.98	Regions Bank	XXXXXX8724	Sterling Online Processing Services, LLC	Frank Bell	5/26/2011	REG #8724
\$246.85	SunTrust Bank	XXXXXXXXXX0477	Alys Beach Account	James Shaw Carole Shaw	8/11/2014	ST #0477
\$66,312.33	SunTrust Bank	XXXXXXXXXX7073	Carole Shaw	Carole Shaw	5/1/2013	ST #7073
\$115,774.55	SunTrust Bank	XXXXXXXXXX7380	James or Carole Shaw	James Shaw Carole Shaw	3/28/2012	ST #7380
\$2,873,324.89	TD Ameritrade	XXX-XX3551	Lullwater Holdings, LLC	Tyson Rhame	11/1/2011	TDA #3551
\$508,431.62	TD Ameritrade	XXX-XX5715	Lullwater Holdings, LLC	Tyson Rhame	9/1/2012	TDA #5715
\$3,106,534.41	TD Ameritrade	XXX-XX5720	The TAR Revocable Trust	Tyson Rhame	09/01/2012	TDA #5720
\$8.21	TD Ameritrade	XXX-XX7569	Lullwater Holdings, LLC	Tyson Rhame	10/1/2011	TDA #7569
\$72.61	USAA Federal Savings Bank	XXXXX-X184-2	Tyson Rhame	Tyson Rhame	09/15/2011	USAA #1842
\$104,336.14	USAA Federal Savings Bank	XXX-X327-2	Tyson Rhame	Tyson Rhame	4/2/1997	USAA #3272
\$1,041,448.99	Wedbush Morgan Securities Inc.	XXXX4008	Broadway Trader 4Z, LLC	James Shaw	03/18/2015	WED #4008
\$3,043,242.98	Wedbush Morgan Securities Inc.	XXXX8860	Springlake Trading, LLC	James Shaw	08/05/2014	WED #8860
\$3,000.00	Wells Fargo	XXXXXX0124	Scotch Cove, LLC	Tyson Rhame	3/14/2014	WF #0124
\$36,200.72	Wells Fargo	XXXXXX0132	RG Classics, LLC	Tyson Rhame REDACTED	3/19/2014	WF #0132
\$30,843.89	Wells Fargo	XXXXXX0165	Isolveit.com, LLC	Tyson Rhame Frank Bell	5/8/2014	WF #0165
\$126.02	Wells Fargo	XXXXXX0199	Sterlingfunder, LLC	Tyson Rhame James Shaw REDACTED	2/11/2014	WF #0199

Amount/ Value Seized	Bank Name	Account # <sup>1</sup>	Held in the Name of	Authorized Signatories	Date Opened	Referenced hereinafter as
\$94,635.98	Wells Fargo	XXXXXX0223	Sherrills Ford Holdings, LLC	Tyson Rhame	3/8/2014	WF #0223
\$9,787.45	Wells Fargo	XXXXXX0231	Alex Capital Holdings, LLC	Tyson Rhame James Shaw	9/12/2012	WF #0231
\$1,297.77	Wells Fargo	XXXXXX0280	Trinvest Partners, LLC	Tyson Rhame	12/11/2012	WF #0280
\$13,961.39	Wells Fargo	XXXXXX0298	Sky Combat Blue, LLC	Tyson Rhame	1/3/2013	WF #0298
\$293,814.26	Wells Fargo	XXXXXX0371	TR East Point Real Estate, LLC	Tyson Rhame	8/28/2013	WF #0371
\$9,940.00	Wells Fargo	XXXXXX0397	TR Interactive Technologies, LLC	Tyson Rhame	10/21/2013	WF #0397
\$37,878.22	Wells Fargo	XXXXXX0496	Polaris Aviation, LLC	Tyson Rhame	10/25/2012	WF #0496
\$22,797.65	Wells Fargo	XXXXXX0579	Sky Combat Red, LLC	Tyson Rhame	12/12/2012	WF #0579
\$37,015.37	Wells Fargo	XXXXXX2673	Cascades at Rea, LLC	Tyson Rhame	7/10/2014	WF #2673
\$99,970.00	Wells Fargo	XXXXXX2681	Arrowhead Station Holdings, LLC	Tyson Rhame	9/11/2014	WF #2681
\$201,572.39	Wells Fargo	XXXXXX2821	Sterling Online Processing Services	Frank Bell	11/15/2011	WF #2821
\$178,791.99	Wells Fargo	XXXXXX2839	Sterling Online Processing Services	Frank Bell	11/15/2011	WF #2839
\$85,038.93	Wells Fargo	XXXXXX2850	Tyson Rhame	Tyson Rhame	3/14/2012	WF #2850
\$122,487.52	Wells Fargo	XXXXXXXX3245	Miracle Charters, LLC	Tyson Rhame REDACTED	Unknown	WF #3245
\$38,036.83	Wells Fargo	XXXXXX3808	GID Partners, LLC	Frank Bell	10/8/2013	WF #3808
\$1,597,831.09	Wells Fargo	XXXXXX4675	Tyson Rhame	Tyson Rhame	03/15/2012	WF #4675
\$77,676.58	Wells Fargo	XXXXXX4767	Primestone Properties, LLC	James Shaw REDACTED	4/30/2014	WF #4767
\$50,048.42	Wells Fargo	XXXXXX5133	TR Real Estate, LLC	Tyson Rhame	2/29/2012	WF #5133
\$1,201,546.95	Wells Fargo	XXXXXX5439	Lullwater Holdings, LLC	Tyson Rhame	10/25/2011	WF #5439

Amount/ Value Seized	Bank Name	Account # <sup>1</sup>	Held in the Name of	Authorized Signatories	Date Opened	Referenced hereinafter as
\$40,516.12	Wells Fargo	XXXXXX5536	Sterling Online Processing Services	Frank Bell	3/26/2014	WF #5536
\$114,187.52	Wells Fargo	XXXXXX5551	Whistlejacket, Inc.	Frank Bell	3/26/2014	WF #5551
\$43,132.68	Wells Fargo	XXXXXX6320	J-Brem, LLC	Frank Bell	8/14/2012	WF #6320
\$1,611.81	Wells Fargo Advisors	XXXX-6797	Tyson Rhame	Tyson Rhame	06/28/2012	WF #6797
\$158,010.36	Wells Fargo	XXXXXX7400	Therrell Farms Estates, LLC	Tyson Rhame	9/23/2014	WF #7400
\$8,796.58	Wells Fargo Advisors	XXXX-7939	Lullwater Holdings, LLC	Tyson Rhame	6/28/2012	WF #7939
\$139,577.61	Wells Fargo	XXXXXX8032	Lullwater Holdings, LLC	Tyson Rhame	10/25/2011	WF #8032
\$79,896.51	Wells Fargo	XXXXXX8575	GID Partners, LLC	Frank Bell	10/8/2013	WF #8575
\$16,882.82	Wells Fargo	XXXXXX8594	Frank Bell	Frank Bell	3/26/2014	WF #8594
\$61,854.65	Wells Fargo	XXXXXX8658	Trinvest, LLC	Tyson Rhame	10/27/2014	WF #8658
\$39,597.41	Wells Fargo	XXXXXX8674	Zonolite Holdings, LLC	Tyson Rhame	10/23/2014	WF #8674
\$44,405.30	Wells Fargo	XXXXXX9969	Sustainability Solutions, LLC	Tyson Rhame	5/21/2014	WF #9969

(collectively the Defendant Properties).

2. Based on the evidence described below, the Defendant Properties are subject to forfeiture to the United States pursuant to 18 U.S.C. § 981(a)(1)(C) as proceeds of specified unlawful activity traceable directly and indirectly to violations of 18 U.S.C. §§ 1341, 1343, 1349, 1956, and 1957.

3. Additionally, the Defendant Properties are subject to forfeiture to the United States pursuant to 18 U.S.C. § 981(a)(1)(A) as property involved in money laundering offenses in violation of 18 U.S.C. §§ 1956 and 1957.

4. This Court has jurisdiction over this action and the claims raised herein by virtue of 28 U.S.C. §§ 1345 and 1355(a).

5. Venue is proper in the Northern District of Georgia because those properties are located and remain herein. *See* 28 U.S.C. §§ 1395(a) and (b).

6. Additionally, venue is proper in the Northern District of Georgia as to all of the Defendant Properties because acts in furtherance of the conspiracies and substantive offenses alleged above occurred herein and because the offenses subjecting that property are properly chargeable in the Northern District of Georgia. *See* 28 U.S.C. §§ 1355 (b) and 1395(a) and (b).

## **II. Facts Giving Rise to Forfeiture**

### **A. The Business of Sterling Currency Group**

7. Since at least 2004, Sterling Currency Group, LLC (“Sterling”), an Atlanta, Georgia-based business that also does business under the name Dinar Banker, has become one of the largest sellers of Iraqi dinar in the United States. While Sterling also offers the sale of what its website calls “other exotic currencies,” including the Vietnamese Dong, Indonesian Rupiah, Afghani, and Chinese Yuan, the bulk of Sterling’s business comes from the sale of the Iraqi dinar.

8. Sterling is one of several money service businesses in the United States that purchases the Iraqi dinar abroad for sale to customers in the United States and Canada.

9. Sterling purchases its inventory of dinar notes from exchangers in the Middle East, transports the notes in bulk to the United States via commercial carrier, retrieves the notes from Hartsfield Jackson International Airport, and trucks them for storage to a business location in Atlanta, Georgia, where they remain available to fill customer orders placed on its websites (initially at [www.dinarbanker.com](http://www.dinarbanker.com) and now at [www.sterlingcurrencygroup.com](http://www.sterlingcurrencygroup.com)) and over the telephone.

10. Sterling operates in partnership with Sterling Online Processing ("Sterling Online"), which provides administrative services for Sterling, as well as GID Partners ("GID Partners"), which is an Iraqi dinar exchanger purchased by Sterling.

11. Tyson Rhame (Rhame) and James Shaw (J.Shaw) are the co-owners and co-founders of Sterling. Rhame and Shaw share ownership of Sterling through their respective interests in several corporations, including Alex Capital Holdings ("Alex"), Lullwater Holdings ("Lullwater"), and Curtis Creek Holdings ("Curtis Creek") as well as the trusts "Valley Trust" and "Lullwater Trust."

12. Carol Laurette Shaw (C.Shaw) is married to J.Shaw and is also a co-owner of Sterling through her interests in Alex, Curtis Creek, and Valley Trust. As recently as 2011, C.Shaw played an active role in Sterling's operations.

13. Frank Bell (Bell) began working for Sterling in 2010 and, as of June 3, 2015, was Sterling's Chief Operating Officer (COO). As COO, Bell ran the day-to-day affairs of Sterling.

14. Since at least 2010, Rhame, J.Shaw, C.Shaw, and Bell have shared control of Sterling's operations.

#### **B. Knowledge of the Scam**

15. Sterling's success is at least partially attributable to its use of the facilities of interstate commerce, including wire communications, both directly and indirectly, to disseminate and facilitate the dissemination of false and misleading information about the possibility of a revaluation of the dinar and to steer customers toward choosing Sterling over its competitors.

16. The revaluation (or simply, "RV") theory has spread throughout the Internet and is promoted by a variety of internet blogs and individuals who hold themselves out to be currency experts or "dinar gurus." According to the RV theory, the dinar will experience an abrupt, exponential rise in value against the U.S. dollar and hence yield enormous profits for dinar holders.

17. An individual who worked for Sterling from approximately 2013 to 2015 confirmed that Bell at one point told customer service center representatives in a meeting that there would never be an Iraqi dinar revaluation. Bell instructed the representatives not to tell callers that the revaluation will never occur but to tell the callers to do their own research.

18. Email communications between Rhame, J.Shaw, C.Shaw, and Bell confirm that these individuals know that the concept of the dinar revaluation is a scam.

- a. On November 3, 2010, J.Shaw sent an email to Rhame entitled, "Discussion Point," an email that he also forwarded to C.Shaw, which read, in part:

Ty,

The point of my call was not to talk about net worth. We have a business that I valued at \$8-10 million in that formula (SCG). Laurette and I do not think about how much is hers and mine as you do in your relationship (like I should give her 99% of profits). We are 50-50 partners on everything and if we ever split up we would divide all assets as such. She has lately been very nervous and was crying last night because she knows we are running an illegal operation.

The point is that her [sic] and I have worked way too hard in life for us to risk everything based on your belief (even if I agree with you) that the Iraqi dinar will not RV and it is ok to make millions of dollars in false promises to our customers. Not only are we risking everything we own, we are risking serious jail time as promoters of a ponzi scheme.

If it was no problem for Abul to sign, then we should have back. It is ok to pay him to sign actual hedging contract.

On a different note, I now calculate we are at least 500k to 600k off on ending Oct numbers. Is this because of the Abul shipment that you picked up to day [sic] that we had already paid for that is not included in ending numbers?

Please call to discuss and I will meet with you to [sic] at your place to discuss stefano strategy and go over numbers.

Jim



19. A series of emails sent on November 30, 2010, and December 1, 2010, further shows knowledge and intent.

- a. On November 30, 2010, Rhame sent an email to J. Shaw that J.Shaw then forwarded to C.Shaw, which read,

I'm writing this down and emailing it to you because  
"You're Not Getting It."

Check out Dinar Trade's website.

Our business is chicken shit and we got CRUSHED in a conference call on Sunday night---not because of anything said against us, but because we operate small minded and haven't been growing. We are not a real company.

Our sales are going to drop compared to Dinar Trade because they are a better company.

I got beat up in a conference call again last night because of our limited growth.

The reason we aren't growing is because I'm wasting my time and effort shipping 50-100 packages a day and managing non-sales, non-growth related issues(accounting, operational screw-ups, compliance, etc) that I shouldn't be spending my time and effort on.

Dinar Trade does 300-400 Million in sales a year and is growing---these numbers are conservative based on what Abul knows he is buying and based on DinarTrade's Fedex shipping volume.

Check out Dinar Trade's website these days.



Dinar Trade has affiliations now with a trust company (Entrust) and links for setting up IRAs and investing in Dinar through IRAs.

Dinar Trade now has a Safe Keeping facility for dinar and the computer programs to track and monitor.

Dinar Trade has a Middle East exchange office that gives him worldwide banking with a dozen banks.

Dinar Trade has solid banking at 6 major US banks.

Dinar Trade has an A+ BBB rating.

Dinar Trade has a full time accountant.

Dinar Trade has first rate legal advise. [sic]

Dinar Trade has a full time compliance officer.

Dinar Trade has a 40 phone call center.

Dinar trade has a fully integrated shipping department.

Dinar Trade is a real company making AT LEAST 35 million a year on sales . [sic] We are not. The reason we are not is because the guy(me) [sic] who generates all the business through affiliations, articles, videos, website content, conference calls, strategy, branding, and innovation is WASTING his time shipping 50-100 packages every day and dealing with ridiculous operational problems.

Ali, isn't shipping any packages or handling anything else operationally, that's why he is kicking our ass. That's why he runs a real company.

We don't even have back-up banking right now because I'm to [sic] busy doing stuff that isn't growing our business. We're barely surviving.

Something has to change very quickly in how we operate. I'm tired of being part of a non-business that I have to fight against to grow.

Do you want to be small? Is this enough for you? Do you want to coast and let business trail off again? Do you feel like you're putting in too much effort right now for the money we're making? Do you have enough money? Do you want to do something else that you think can make more money?

Ali has offered several times for me to come join him and bring my share of the business his way. I like having our own business, but he is offering some real incentives (as much as I'm making right now) and I can focus on generating sales, growing business, and innovating rather than doing everything else I do, and then shipping packages all day and night. I'm trying to ask myself why I keep doing it. Please explain it to me.

I've just about had it. I don't like getting my ASS KICKED on a conference call and losing business. I don't like it that I haven't had time to even establish back-up banking in the past month or do anything else to grow/maintain our business. I know you're concerned about being able to take a vacation in February and how you're going to manage that, but I'm really hitting my limit here. I'm not having someone come into my small house and start training them to ship and do accounting. Period.

- b. J.Shaw's response to Rhame, one that he forwarded to C.Shaw, stated:

Laurettes [sic] job is just as important as yours. I am sick of seeing her work most days and nights just to have you pretend to be doing so much more than anyone. I know you have done this in all your personal relationships (i.e. girlfriends) as well as you like to envision yourself superior to others.

If you recall we only even sold on ebay till I got stefano for website. now your [sic] entertaining offers from Ali. What bullshit. I am not sure how much bigger this business needs to be until it can be managed properly. We are at risk for lawsuits and other problems. We are not selling Coca Cola.

- c. On November 30, 2010, another email from J.Shaw to Rhame, one that J.Shaw ultimately forwarded to C.Shaw more than a year later on December 20, 2011, read as follows:

Ty,

The more I think of your bullshit emails the more it disgusts me. I bankrolled this entire business at its inception by putting up 80% of initial capital (500/630). Throw in Zurich and I bankrolled 95% of all finances. Laurette has done at least 50% of the work and I was instrumental in our website and getting the business growing. Our agreement was that you and Laurette would work the business. How much work has Bonnie done? AS SOON AS THE BUSINESS STARTS TO DO REALLY WELL, YOU START THROWING OUT YOUR CONTROL FREAK EMAILS. Maybe you should just say thanks versus the shit I am hearing from you.

FYI: Laurette and I are concerned about getting letters to you thanking you for helping them with their hospital with their purchase of \$20k for a \$200k layaway and other similar letters.

We are not Charlatans and I do not like making money under false pretenses. I DONOT [sic] WANT TO BE ALI. Our life is happy without swindling people.

20. Additionally, a March 22, 2011, set of emails further shows that Rhame and C.Shaw were aware of wrongdoing at Sterling.

- a. Specifically, on that date, Rhame sent C.Shaw an email that copied J.Shaw with the subject, "Comments related to AMENDED Operating Agreement" in which he asserted, "This amendment is complete bullshit written for the purpose of obtaining banking. Jim and Ty are operation [sic] under the original partnership agreement. We are 50% partners and his ass will go to prison if mine does."
- b. Thereafter, C.Shaw replied, "and won't your asses have an interesting time there. NOT."

21. Likewise, on August 6, 2012, J.Shaw sent Bell an email with the subject line, "not great article," that contained a hyperlink to a news article entitled, "You Can't Fix Stupid - The Iraqi Dinar Scam Lives."

### **C. Sterling's Unlawful Business Practices**

22. Sterling's unlawful business practices fall into at least two categories. First, Sterling unlawfully used at least one revaluation promoter to disseminate false information and steer prospective dinar purchasers toward Sterling. Second,

Sterling used telephone conversations and its own web site to make false representations and false promises to its customers.

i. Sterling's Use of the RV Promoters' Web Sites

23. Sterling has knowingly benefitted from false representations made by web sites and blogs, including "The GET Team."

24. The GET Team, which is led by an individual known as TerryK, runs an internet chat room and weekly conference calls in which information about the Iraqi dinar is discussed. During those chats and conferences, TerryK spreads false information suggesting that the revaluation is about to occur.

25. In a September 13, 2010, email, TerryK introduced himself to Rhame:

Ty, My name is TerryK, I own the worlds [sic] largest Dinar web site going....we have currently 7200 members and currently we hold two calls a week with about 1500 on the call and 100's if not 1,000's on skype listening in...what I would like to do is open a discussion with you and maybe have you on a call this coming wed night. It starts at 9pm and thought maybe 10-15 min on how you operate, how to cash in with your firm and then a question and answers session....let me know via email [sic].

terryk.

26. Thereafter, beginning at least as early as 2011, Sterling began making monthly payments in the amount of \$4,000 to TerryK. In total, Sterling has paid TerryK more than \$160,000 since 2011.

27. Since TerryK's 2010 email, Sterling employees, including Bell and Rhame, have routinely spoken on the GET Team's weekly conference calls. For example, on the May 27, 2015, GET Team conference call, Bell stated that Sterling would be

offering a “flash sale” in early June 2015. During this conference call, TerryK stated that listeners should purchase currency from Sterling, that he trusted his friends “Ty” and “Frank” at Sterling, and that he had so much trust in Bell that he would be comfortable giving Bell his bank account information.

28. In the GET Team chat room and during the weekly conference calls, TerryK also passed along false information purportedly received from sources about the revaluation of the Iraqi dinar and other currencies (such as the Vietnamese dong).

- a. For example, on the March 12, 2014, conference call, TerryK stated that a source at Wells Fargo had told him “it” was supposed to happen but that the time kept changing.
- b. Likewise, on the April 16, 2014, conference call, TerryK said that he had heard from the “UST,” a reference to the U.S. Department of Treasury, that the rate was good and that everything would be released that week.

29. On June 3, 2015, TerryK acknowledged during an interview with the Federal Bureau of Investigation (FBI) that he had fabricated source information on GET Team online postings and conference calls.

30. In fact, the U.S. Department of Treasury is not preparing and has never prepared for an Iraqi dinar revaluation.

31. Similarly, Wells Fargo does not trade in the Iraqi dinar and also warns its customers not to invest in it. In fact, a publicly available Wells Fargo Advisors

Memorandum dated March 10, 2014, states that Wells Fargo is not preparing for an Iraqi dinar revaluation and has no plans whatsoever to exchange the Iraqi dinar.

32. Moreover, a November 7, 2011, email exchange between TerryK, Rhame and Bell confirms that TerryK and Sterling have sought to keep the specific nature of their relationship secret.

a. On that date, TerryK sent an email to Rhame and Bell that read:

"I want to make sure that our arrangement is between us and no one else...As no one else needs to know about our arrangement... Please confirm...

Thanks for all you guys do... [sic]"

b. Bell's reply, sent that same day, read, "Absolutely noone [sic] but us [sic]."

33. Although on May 28, 2015, Bell represented to the FBI during an interview that Sterling maintains a "firewall" between itself and revaluation promoters, email records belie his assertions.

a. For instance, on May 2, 2012, TerryK sent an email to Bell that read as follows:

You should have gotten a lot of business on the reserves the past week, been pushing it hard on the site bro.....make sure TY is not selling dinar from the middle table that one is mine.....[sic]"

Bell's reply, sent the following day, read, "TK, Will do, thanks for your support."

b. Likewise, on March 11, 2013, TerryK sent Bell an email that read,

FYI Received payment today, thanks for following up..What else can I do to help sales for your team? Just let me know buddy, I will be in the room later today to get some things moving as well [sic].

c. Also, on July 22, 2013, TerryK sent Bell an email reading as follows:

Frank, please find attached the banner invoice for the month of August 2013, I trust things are going well, as we keep promoting the heck out of Sterling.. [sic] If there is anything you need let me know.

34. On June 3, 2015, Bell acknowledged to FBI agents that Sterling should not have continued to do business with the dinar promoters.

ii. False Representations and Promises on Sterling's Website

35. Sterling's business practices have included publishing information on its own website that its principals knew to be untrue and disseminating false information over the telephone.

36. For instance, though Sterling's website now warns customers that "Sterling Currency Group / DinarBanker is not an accredited financial consultant" and "that the value of the currency may go down or go up depending on circumstances beyond our control," in 2010, Sterling, used its former website, [www.dinarbanker.com](http://www.dinarbanker.com), to suggest that a revaluation could occur in the near future.



37. Furthermore, on of December 27, 2010, Sterling's website displayed an article titled "Iraqi Dinar Revaluation" that cited Tyson Rhame as its primary source and that stated, in part:<sup>2</sup>

To put it simply, the Iraqi Dinar is currently worth less than 1/10th of a US penny (Approximately \$1000 US dollars buys 1 million Iraqi Dinar). Historically, the Iraqi Dinar has been worth over 3 US dollars for every Iraqi Dinar (Over \$3,000,000 US dollars purchased 1 million Iraqi Dinar). Put another way, 1 million Iraqi Dinar is currently worth a little less than 1000 US dollars and historically 1 million Iraqi Dinar has been worth well over \$3,000,000.00 US dollars. So, the question is: **Will the Iraqi Dinar increase in value? And if so, how? And when?**

\* \* \* \*

The bottom line is that the Iraqi Dinar is currently at an extremely low valuation compared to the US Dollar. The currency has steadily increased in value since inception in late 2003. **Iraq is a country with phenomenal wealth potential; and additionally, has the backing and support of the major political and economic powers of the world.** There currently seems to be minimal risk that the Iraqi Dinar will decrease in value. The tremendous potential upside return compared to the minimal downside risk seems to make the Iraqi Dinar a compelling investment opportunity worth investigating.

\* \* \*

**In determining when the Iraqi Dinar will increase in value, all indicators point toward something happening in the near future (next 12 months) if not the very near future (next 3 months).** The appreciation of the Iraqi Dinar has been unprecedentedly flat over the past 8 months despite low Iraqi inflation and a weakening US economy and US dollar. The Iraqi

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<sup>2</sup> All emphases are in the original material.

economy has been on a continual surge of economic growth for the past couple of years as Iraq has continued to stabilize and rebuild. The news coming out of Iraq from numerous returning military members with various reliable sources indicates a rapid move and increase in valuation occurring prior to, or in conjunction with US troop reductions. Indicators also point to an increase in the Iraqi Dinar exchange rate occurring prior to, or shortly after Iraqi elections. It appears that administratively, the IMF, WTO, and other world financial entities are working in close conjunction with the Iraqi Government to bring Iraq's financial system online with the rest of the world. The expectation is that the Iraqi Dinar will soon be freely traded through banks worldwide---further accelerating their recovery and economy, and adding to overall stability.

\* \* \*

To answer the question of 'How' and 'How high?' the Iraqi Dinar will revalue, some speculation is in order. Based on historical precedents, an initial sudden significantly (overnight/over weekend) high revaluation seems very possible. **This initial move could be anywhere along the entire spectrum of rumored possibilities from \$.01 to \$1.49. After this initial revaluation, it seems likely there will be numerous significant incremental increases in valuation over a period of time.** This continual increase in value after an initial base valuation will prevent an overwhelming surge on the world financial system. By incrementally increasing the value of the dinar, it will limit the number and amount of Iraqi Dinar exchanges as many investors and currency traders will choose to hold their Iraqi Dinar or purchase more as they anticipate further valuation increases. In other words, a steady increase in the value of the Iraqi Dinar will create a free flowing market as some investors cash-out, others hold on, and others purchase Iraqi Dinar for the first time.

38. In contrast, since that time, Bell has told FBI agents that he believes that the Iraqi dinar will never revalue. In a May 28, 2015, interview with the FBI, Bell explained that based upon his education and experience with international finance,

he believes that the Iraqi dinar will never be revalued to the extent that dinar promoters commonly claim. Furthermore, in a June 3, 2015, interview with the FBI, Bell used the term “mythology” when discussing the concept of an Iraqi dinar revaluation.

39. In 2010, Sterling’s website also represented that following the revaluation, customers would be able to exchange their Iraqi dinars at kiosks or “remote satellite offices” located at airports around the country.

40. Postings to Sterling’s website are illustrative.

- a. For instance as of January 3, 2010, Sterling’s website displayed an article titled, “Complete Guide To Exchanging Iraqi Dinar After Revaluation” that stated, in part,

**Dinar Banker has the ability to set up secure remote satellite offices at numerous airport locations nationwide within 24 hours. They have a long history of transporting and securing currency all over the world through their global operations and are prepared for any exchange needs.<sup>3</sup>**

- b. Similarly, as of October 21, 2010, Sterling’s website displayed an article titled, “Iraqi Dinar Exchange Locations” that stated, in part:

DinarBanker will have secure remote satellite offices set up at numerous airport locations nationwide as soon as possible in the event of a revaluation. You will not have to go through security in the airport

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<sup>3</sup> Emphasis in original.

exchange locations - You can simply come in with Dinar in a briefcase or luggage and come to the exchange location set up in the office area of each airport. We will have de la Rue machines to quickly count and verify your Dinar and all equipment needed to perform fast and secure wire transfers.

- c. That same article then represented that the "Current Exchange Locations" that Sterling planned "in the Event of an RV include[d]:"

**City, State - Airport Code**

Atlanta, GA - ATL  
Boston, MA - BOS  
Chicago, IL - ORD  
Cincinnati, OH - CVG  
Dallas / Fort Worth, TX - DFW  
Denver, CO - DEN  
Detroit, MI - DTW  
Houston, TX - IAH  
Las Vegas, NV - LAS  
Los Angeles, CA - LAX  
Miami, FL - MIA  
Minneapolis, MN - MSP  
New Orleans, LA - MSY  
New York, NY - JFK  
Phoenix, AZ - PHX  
Salt Lake City, UT - SLC  
San Francisco, CA - SFO  
Seattle, WA - SEA  
St. Louis, MO - STL  
Tampa, FL - TPA  
Washington, DC - DCA (Ronald Reagan)  
Washington, DC - IAD (Dulles)

**International Locations**

Calgary, Canada - YYC  
Vancouver, Canada - CYVR  
Toronto, Canada - CYXZ  
San Juan, Puerto Rico

41. In 2010, Rhame told a Sterling customer over the telephone that Sterling would open a kiosk at John F. Kennedy International Airport in New York following the revaluation to exchange Iraqi dinars for U.S. dollars.

42. Despite these representations, a former Sterling employee has confirmed that Sterling never had any arrangements with airports to operate remote satellite offices or kiosks. Furthermore, representatives from three of the above-listed airports have confirmed that Sterling never had arrangements to operate remote satellite offices or kiosks.

**III. The Money Laundering Scheme**

43. Sterling's customers pay for their purchases via eChecks, wire transfers, cashier's checks, official bank checks, certified checks, money orders, and Collect on Delivery, and Sterling ships the dinar notes to the purchaser in interstate commerce.

44. Sterling's revenues have been considerable, for since 2004, Sterling has earned over \$600 million in gross sales or receipts.

- a. Between 2004 and 2011, Sterling reported the following gross receipts:

Year	Gross receipts
2004	\$4,932,065

2005	\$4,827,368
2006	\$1,061,127
2007	\$4,899,750
2008	\$18,105,972
2009	\$13,506,661
2010	\$25,932,324
2011	\$245,411,774

- b. In 2012 and 2013, when Alex, Sterling's parent entity, reported Sterling's revenues, gross receipts reached the following totals:

Year	Gross receipts
2012	\$126,465,731
2013	\$109,169,253

- c. Sterling's gross revenues between January and September 2014 totaled approximately \$85,602,807.

45. As described below, once Sterling received payments from its customers, it, Sterling Online, GID, Alex, Lullwater, Lullwater Trust, Curtis Creek, Valley Trust, Rhame, J.Shaw, C.Shaw, and Bell engaged in financial and monetary transactions in tainted funds that diffused proceeds of the fraud scheme throughout a complex network of accounts held in the names of a myriad of trusts and business entities in addition to individuals, often in amounts of more than \$10,000, with intent to promote the unlawful fraud scheme and for the purpose of concealing and disguising the nature, source, location, ownership, and control of those proceeds.

46. In addition to the accounts referenced in paragraph 1(w), the below-listed accounts were also used in furtherance of the money laundering scheme:

Bank Name	Account #	Held in the Name of	Authorized Signatories	Date Opened	Referenced hereinafter as
Bank of America	XXXXXXXX3681	Web Stormz, LLC	Redacted	11/4/2011	BOA #3681
Bank of America	XXXXXXXX4406	Web Stormz, LLC	Redacted	5/28/2014	BOA #4406

47. The following chart describes the ownership interests between Alex, Sterling, Sterling Online, GID, Curtis Creek, Lullwater, Lullwater Trust, and Valley Trust:

Company	Partners	Percentage	Incorporation State
Alex Capital Holdings, LLC	Curtis Creek Holdings, LLC	50%	Delaware
	Lullwater Holdings, LLC	50%	
Sterling Currency Group, LLC	Alex Capital Holdings, LLC	100%	Georgia
Sterling Online Processing Services, LLC	Curtis Creek Holdings, LLC	50%	Georgia
	Lullwater Holdings, LLC	50%	
GID Partners, LLC	Alex Capital Holdings, LLC	100%	Georgia
Curtis Creek Holdings, LLC	JS, LS, Valley Trust		South Dakota
Lullwater Holdings, LLC	TR, Lullwater Trust		South Dakota

48. Rhame controls Lullwater directly and through Lullwater Trust. Similarly, J.Shaw and C.Shaw own Curtis Creek directly and through Valley Trust. Finally, Bell manages the daily affairs of the Sterling entities as the Chief Operation Officer and through his company, Whistlejacket.

### A. Seized Bank Accounts

49. On June 3, 2015, federal agents executed seizure warrants issued from the United States District Court for the Northern District of Georgia and seized the accounts listed in paragraph 1(w).

50. Sterling has used at least nine known bank accounts to receive currency purchase money from investors.

51. As detailed in Exhibits A, B, C, D, and E to this Complaint, proceeds from sales of currency to consumers were received in the nine accounts listed below, and gross deposits into each account during the range specified appear below:

Date Range	Account	
02/01/2011 to 05/11/2011	FTB #9640	\$ 26,005,096.82
07/26/2011 to 11/18/2011	GCB #5361	\$ 13,704,389.63
07/19/2011 to 11/18/2011	GCB #5379	\$ 51,876,456.67
11/16/2011 to 11/01/2013	WF #2821	\$ 20,436,714.53
11/11/2013 to 10/31/2014	ACT #2-74	\$ 3,162,078.82
11/05/2013 to 10/31/2014	ACT #1-74	\$ 69,831,589.87
01/02/2014 to 11/28/2014	CHEL #5493	\$ 4,098,617.38
02/26/2014 to 11/28/2014	CHEL #9734	\$ 28,915,707.06
01/02/2014 to 02/28/2014	CHEL #0592	\$ 4,757,490.52
	<b>TOTAL</b>	<b>\$222,788,141.30</b>



52. Thereafter, as shown in exhibits A-K, tainted funds flowed from, through, and into the accounts listed in paragraph 1(w), a significant number of which were held in names other than Sterling

53. The purposes behind some of those financial transactions included remitting proceeds to conspirators, facilitating the operation of the underlying scheme, and concealing and disguising the nature, source, location, ownership, and control of fraud proceeds.

54. Additionally, by moving the tainted funds out of receiving accounts and into “downstream” accounts, conspirators engaged in unlawful monetary transactions involving more than \$10,000 in tainted funds

55. The bank accounts listed in paragraph 1(w) are forfeitable as proceeds traceable directly and indirectly to schemes and artifices to defraud and properties involved in money laundering offenses

#### **B. Assets Seized on June 3, 2015**

56. On June 3, 2015, federal agents seized the following items from Sterling’s business premises, located at 2751 Buford Highway NE, #207, Atlanta, GA 30324 (as listed in paragraph 1(a)–(f)):

- a. Approximately 8,671,456,050 in Iraqi dinars;
- b. Approximately 13,317,698,200 in Vietnamese Dongs;
- c. Approximately 2,100 in Afghanis;
- d. Approximately 100 in Chinese Yuans;

- e. Approximately 1,600,000 in Indonesian Rupiahs; and
- f. Approximately 29 silver coins.

57. On June 3, 2015, federal agents seized the following items from 4536 E. Brookhaven Drive, Atlanta, Georgia 30319 (as listed in paragraph 1(g)-(v)):

- a. Approximately 14,396,403 in Iraqi dinars;
- b. Approximately 20,000 in Vietnamese Dongs;
- c. Approximately 150,000 in Bank of Mozambique notes;
- d. Approximately 23,200 in Bank of Egypt notes;
- e. Approximately 1,000 in Union of Burma bank notes;
- f. Approximately 1,000,000 in Republic of Iran bank notes;
- g. Approximately 9,799 in Chinese Yuans;
- h. Approximately 1,502,600 in Afghanis;
- i. Approximately 2,450 in Bank of Suriname notes;
- j. Approximately 9,300 in Bank of Yugoslavia notes;
- k. Approximately 155,000 in Cambodian Bank notes;
- l. Approximately 500 in Brazilian currency;
- m. Approximately 1,000 in Bank of Sudan notes;
- n. Approximately 182 gold coins;
- o. Approximately 49 silver coins; and
- p. Approximately \$48,718.00 in United States currency

58. The Defendant Properties listed in paragraph 1(a) through (v) are also forfeitable as proceeds traceable directly and indirectly to schemes and artifices to defraud and properties involved in money laundering offenses.

#### **IV. Conclusion**

59. For all of these reasons, the United States is entitled to forfeiture of the Defendant Properties as proceeds traceable directly and indirectly to schemes and artifices to defraud and properties involved in money laundering offenses.

WHEREFORE, the United States prays:

That the Court forfeit the Defendant Properties to the United States of America;

That the Court award the Plaintiff the costs of this action; and

That the Court grant such other relief as the Court deems just and proper.

Respectfully submitted this 22nd day of February, 2016.

Respectfully submitted,

JOHN A. HORN

*United States Attorney*

*600 U.S. Courthouse*

*75 Ted Turner Drive SW*

*Atlanta, GA 30303*

*(404) 581-6000 fax (404) 581-6181*

/s/THOMAS J. KREPP

*Assistant United States Attorney*

Georgia Bar No. 346781

/s/KELLY K. CONNORS

*Assistant United States Attorney*

Georgia Bar No. 504787

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION

APPROXIMATELY 8,671,456,050 IN  
IRAQI DINARS;  
APPROXIMATELY 13,317,698,200 IN  
VIETNAMESE DONGS;  
APPROXIMATELY 2,100 IN  
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APPROXIMATELY 1,000 IN UNION OF  
BURMA BANK NOTES;  
APPROXIMATELY 1,000,000 IN  
REPUBLIC OF IRAN BANK NOTES;  
APPROXIMATELY 9,799 IN CHINESE  
YUAN;  
APPROXIMATELY 1,502,600 IN  
AFGHANIS;  
APPROXIMATELY 2,450 IN BANK OF  
SURINAME NOTES;  
APPROXIMATELY 9,300 IN BANK OF  
YUGOSLAVIA NOTES;  
APPROXIMATELY 155,000 IN

Civil Action No.

1:15-CV-2677-LMM

CAMBODIAN BANK NOTES;  
APPROXIMATELY 500 IN BRAZILIAN  
CURRENCY;  
APPROXIMATELY 1,000 IN BANK OF  
SUDAN NOTES;  
APPROXIMATELY 182 GOLD COINS;  
APPROXIMATELY 49 SILVER COINS;  
APPROXIMATELY \$48,718.00 IN  
UNITED STATES CURRENCY;  
APPROXIMATELY \$1,826,973.89  
SEIZED FROM BANK ACCOUNT  
XXXX001-75;  
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FROM BANK ACCOUNT XXXX01-99;  
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FROM BANK ACCOUNT XXXX02-75;  
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SEIZED FROM BANK ACCOUNT  
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APPROXIMATELY \$760,456.50 SEIZED  
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APPROXIMATELY \$174,774.29 SEIZED  
FROM BANK ACCOUNT XXX-X0471;  
APPROXIMATELY \$155,872.08 SEIZED  
FROM BANK ACCOUNT XXX-X0478;  
APPROXIMATELY \$155,632.14 SEIZED  
FROM BANK ACCOUNT XXX-X0479;

APPROXIMATELY \$156,016.05 SEIZED  
FROM BANK ACCOUNT XXX-X0480;  
APPROXIMATELY \$3.34 SEIZED  
FROM BANK ACCOUNT XXX-X0488;  
APPROXIMATELY \$100,002.56 SEIZED  
FROM BANK ACCOUNT XXX-X1015;  
APPROXIMATELY \$2,480,140.95  
SEIZED FROM BANK ACCOUNT  
XXX-X2048;

APPROXIMATELY \$308,423.79 SEIZED  
FROM BANK ACCOUNT XXX-X2049;  
APPROXIMATELY \$146,683.66 SEIZED  
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APPROXIMATELY \$141,030.48 SEIZED  
FROM BANK ACCOUNT XXX-X2062;  
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FROM BANK ACCOUNT XXX-X2072;  
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APPROXIMATELY \$217,292.68 SEIZED  
FROM BANK ACCOUNT XXX-X2386;  
APPROXIMATELY \$5,174,942.68  
SEIZED FROM BANK ACCOUNT  
XXX-X2391;

APPROXIMATELY \$318,546.39 SEIZED  
FROM BANK ACCOUNT XXX-X2421;  
APPROXIMATELY \$13,424.15 SEIZED  
FROM BANK ACCOUNT XXX-X2426;  
APPROXIMATELY \$14,231.03 SEIZED

FROM BANK ACCOUNT  
XXXXXX0235;  
APPROXIMATELY \$25,260.98 SEIZED  
FROM BANK ACCOUNT  
XXXXXX8724;  
APPROXIMATELY \$246.85 SEIZED  
FROM BANK ACCOUNT  
XXXXXXXXXX0477;  
APPROXIMATELY \$66,312.33 SEIZED  
FROM BANK ACCOUNT  
XXXXXXXXXX7073;  
APPROXIMATELY \$115,774.55 SEIZED  
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SEIZED FROM BANK ACCOUNT  
XXX-XX3551;  
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FROM BANK ACCOUNT XXX-XX5715;  
APPROXIMATELY \$3,106,534.41  
SEIZED FROM BANK ACCOUNT  
XXX-XX5720;  
APPROXIMATELY \$8.21 SEIZED  
FROM BANK ACCOUNT XXX-XX7569;  
APPROXIMATELY \$72.61 SEIZED  
FROM BANK ACCOUNT  
XXXXX-X184-2;  
APPROXIMATELY \$104,336.14 SEIZED  
FROM BANK ACCOUNT XXX-X327-2;  
APPROXIMATELY \$1,041,448.99  
SEIZED FROM BANK ACCOUNT  
XXXX4008;  
APPROXIMATELY \$3,043,242.98  
SEIZED FROM BANK ACCOUNT  
XXXX8860;  
APPROXIMATELY \$3,000.00 SEIZED  
FROM BANK ACCOUNT



XXXXXX0124;  
APPROXIMATELY \$36,200.72 SEIZED  
FROM BANK ACCOUNT  
XXXXXX0132;  
APPROXIMATELY \$30,843.89 SEIZED  
FROM BANK ACCOUNT  
XXXXXX0165;  
APPROXIMATELY \$126.02 SEIZED  
FROM BANK ACCOUNT  
XXXXXX0199;  
APPROXIMATELY \$94,635.98 SEIZED  
FROM BANK ACCOUNT  
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FROM BANK ACCOUNT  
XXXXXX0231;  
APPROXIMATELY \$1,297.77 SEIZED  
FROM BANK ACCOUNT  
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APPROXIMATELY \$13,961.39 SEIZED  
FROM BANK ACCOUNT  
XXXXXX0298;  
APPROXIMATELY \$293,814.26 SEIZED  
FROM BANK ACCOUNT  
XXXXXX0371;  
APPROXIMATELY \$9,940.00 SEIZED  
FROM BANK ACCOUNT  
XXXXXX0397;  
APPROXIMATELY \$37,878.22 SEIZED  
FROM BANK ACCOUNT  
XXXXXX0496;  
APPROXIMATELY \$22,797.65 SEIZED  
FROM BANK ACCOUNT  
XXXXXX0579;  
APPROXIMATELY \$37,015.37 SEIZED  
FROM BANK ACCOUNT  
XXXXXX2673;

APPROXIMATELY \$99,970.00 SEIZED  
FROM BANK ACCOUNT  
XXXXXX2681;  
APPROXIMATELY \$201,572.39 SEIZED  
FROM BANK ACCOUNT  
XXXXXX2821;  
APPROXIMATELY \$178,791.99 SEIZED  
FROM BANK ACCOUNT  
XXXXXX2839;  
APPROXIMATELY \$85,038.93 SEIZED  
FROM BANK ACCOUNT  
XXXXXX2850;  
APPROXIMATELY \$122,487.52 SEIZED  
FROM BANK ACCOUNT  
XXXXXXXXXX3245;  
APPROXIMATELY \$38,036.83 SEIZED  
FROM BANK ACCOUNT  
XXXXXX3808;  
APPROXIMATELY \$1,597,831.09  
SEIZED FROM BANK ACCOUNT  
XXXXXX4675;  
APPROXIMATELY \$77,676.58 SEIZED  
FROM BANK ACCOUNT  
XXXXXX4767;  
APPROXIMATELY \$50,048.42 SEIZED  
FROM BANK ACCOUNT  
XXXXXX5133;  
APPROXIMATELY \$1,201,546.95  
SEIZED FROM BANK ACCOUNT  
XXXXXX5439;  
APPROXIMATELY \$40,516.12 SEIZED  
FROM BANK ACCOUNT  
XXXXXX5536;  
APPROXIMATELY \$114,187.52 SEIZED  
FROM BANK ACCOUNT  
XXXXXX5551;  
APPROXIMATELY \$43,132.68 SEIZED

FROM BANK ACCOUNT  
XXXXXX6320;  
APPROXIMATELY \$1,611.81 SEIZED  
FROM BANK ACCOUNT XXXX-6797;  
APPROXIMATELY \$158,010.36 SEIZED  
FROM BANK ACCOUNT  
XXXXXX7400;  
APPROXIMATELY \$8,796.58 SEIZED  
FROM BANK ACCOUNT XXXX-7939;  
APPROXIMATELY \$139,577.61 SEIZED  
FROM BANK ACCOUNT  
XXXXXX8032;  
APPROXIMATELY \$79,896.51 SEIZED  
FROM BANK ACCOUNT  
XXXXXX8575;  
APPROXIMATELY \$16,882.82 SEIZED  
FROM BANK ACCOUNT  
XXXXXX8594;  
APPROXIMATELY \$61,854.65 SEIZED  
FROM BANK ACCOUNT  
XXXXXX8658;  
APPROXIMATELY \$39,597.41 SEIZED  
FROM BANK ACCOUNT  
XXXXXX8674; AND  
APPROXIMATELY \$44,405.30 SEIZED  
FROM BANK ACCOUNT  
XXXXXX9969.

#### VERIFICATION

I, W. Scott Baucom, of the Federal Bureau of Investigation, have read the Amended Verified Complaint for Forfeiture in this action and state that its contents are true and correct to the best of my knowledge and belief based upon my personal knowledge of the case and upon information obtained from other law enforcement personnel.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

This 17<sup>th</sup> day of February, 2016.

/s/ 

W. Scott Baucom

Special Agent

Federal Bureau of Investigation

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION

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XXXX4008;  
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SEIZED FROM BANK ACCOUNT  
XXXX8860;  
APPROXIMATELY \$3,000.00 SEIZED  
FROM BANK ACCOUNT  
XXXXXX0124;



APPROXIMATELY \$36,200.72 SEIZED  
FROM BANK ACCOUNT  
XXXXXX0132;  
APPROXIMATELY \$30,843.89 SEIZED  
FROM BANK ACCOUNT  
XXXXXX0165;  
APPROXIMATELY \$126.02 SEIZED  
FROM BANK ACCOUNT  
XXXXXX0199;  
APPROXIMATELY \$94,635.98 SEIZED  
FROM BANK ACCOUNT  
XXXXXX0223;  
APPROXIMATELY \$9,787.45 SEIZED  
FROM BANK ACCOUNT  
XXXXXX0231;  
APPROXIMATELY \$1,297.77 SEIZED  
FROM BANK ACCOUNT  
XXXXXX0280;  
APPROXIMATELY \$13,961.39 SEIZED  
FROM BANK ACCOUNT  
XXXXXX0298;  
APPROXIMATELY \$293,814.26 SEIZED  
FROM BANK ACCOUNT  
XXXXXX0371;  
APPROXIMATELY \$9,940.00 SEIZED  
FROM BANK ACCOUNT  
XXXXXX0397;  
APPROXIMATELY \$37,878.22 SEIZED  
FROM BANK ACCOUNT  
XXXXXX0496;  
APPROXIMATELY \$22,797.65 SEIZED  
FROM BANK ACCOUNT  
XXXXXX0579;  
APPROXIMATELY \$37,015.37 SEIZED  
FROM BANK ACCOUNT  
XXXXXX2673;  
APPROXIMATELY \$99,970.00 SEIZED

FROM BANK ACCOUNT  
XXXXXX2681;  
APPROXIMATELY \$201,572.39 SEIZED  
FROM BANK ACCOUNT  
XXXXXX2821;  
APPROXIMATELY \$178,791.99 SEIZED  
FROM BANK ACCOUNT  
XXXXXX2839;  
APPROXIMATELY \$85,038.93 SEIZED  
FROM BANK ACCOUNT  
XXXXXX2850;  
APPROXIMATELY \$122,487.52 SEIZED  
FROM BANK ACCOUNT  
XXXXXXXXXX3245;  
APPROXIMATELY \$38,036.83 SEIZED  
FROM BANK ACCOUNT  
XXXXXX3808;  
APPROXIMATELY \$1,597,831.09  
SEIZED FROM BANK ACCOUNT  
XXXXXX4675;  
APPROXIMATELY \$77,676.58 SEIZED  
FROM BANK ACCOUNT  
XXXXXX4767;  
APPROXIMATELY \$50,048.42 SEIZED  
FROM BANK ACCOUNT  
XXXXXX5133;  
APPROXIMATELY \$1,201,546.95  
SEIZED FROM BANK ACCOUNT  
XXXXXX5439;  
APPROXIMATELY \$40,516.12 SEIZED  
FROM BANK ACCOUNT  
XXXXXX5536;  
APPROXIMATELY \$114,187.52 SEIZED  
FROM BANK ACCOUNT  
XXXXXX5551;  
APPROXIMATELY \$43,132.68 SEIZED  
FROM BANK ACCOUNT

XXXXXX6320;  
APPROXIMATELY \$1,611.81 SEIZED  
FROM BANK ACCOUNT XXXX-6797;  
APPROXIMATELY \$158,010.36 SEIZED  
FROM BANK ACCOUNT  
XXXXXX7400;  
APPROXIMATELY \$8,796.58 SEIZED  
FROM BANK ACCOUNT XXXX-7939;  
APPROXIMATELY \$139,577.61 SEIZED  
FROM BANK ACCOUNT  
XXXXXX8032;  
APPROXIMATELY \$79,896.51 SEIZED  
FROM BANK ACCOUNT  
XXXXXX8575;  
APPROXIMATELY \$16,882.82 SEIZED  
FROM BANK ACCOUNT  
XXXXXX8594;  
APPROXIMATELY \$61,854.65 SEIZED  
FROM BANK ACCOUNT  
XXXXXX8658;  
APPROXIMATELY \$39,597.41 SEIZED  
FROM BANK ACCOUNT  
XXXXXX8674; AND  
APPROXIMATELY \$44,405.30  
SEIZED FROM BANK ACCOUNT  
XXXXXX9969.

I hereby certify, pursuant to Local Rules 5.1 and 7.1D, that the foregoing  
Amended Verified Complaint for Forfeiture has been prepared using Book

Antiqua, 13 point font.

/s/ Kelly K. Connors  
Assistant U.S. Attorney

Exhibit A

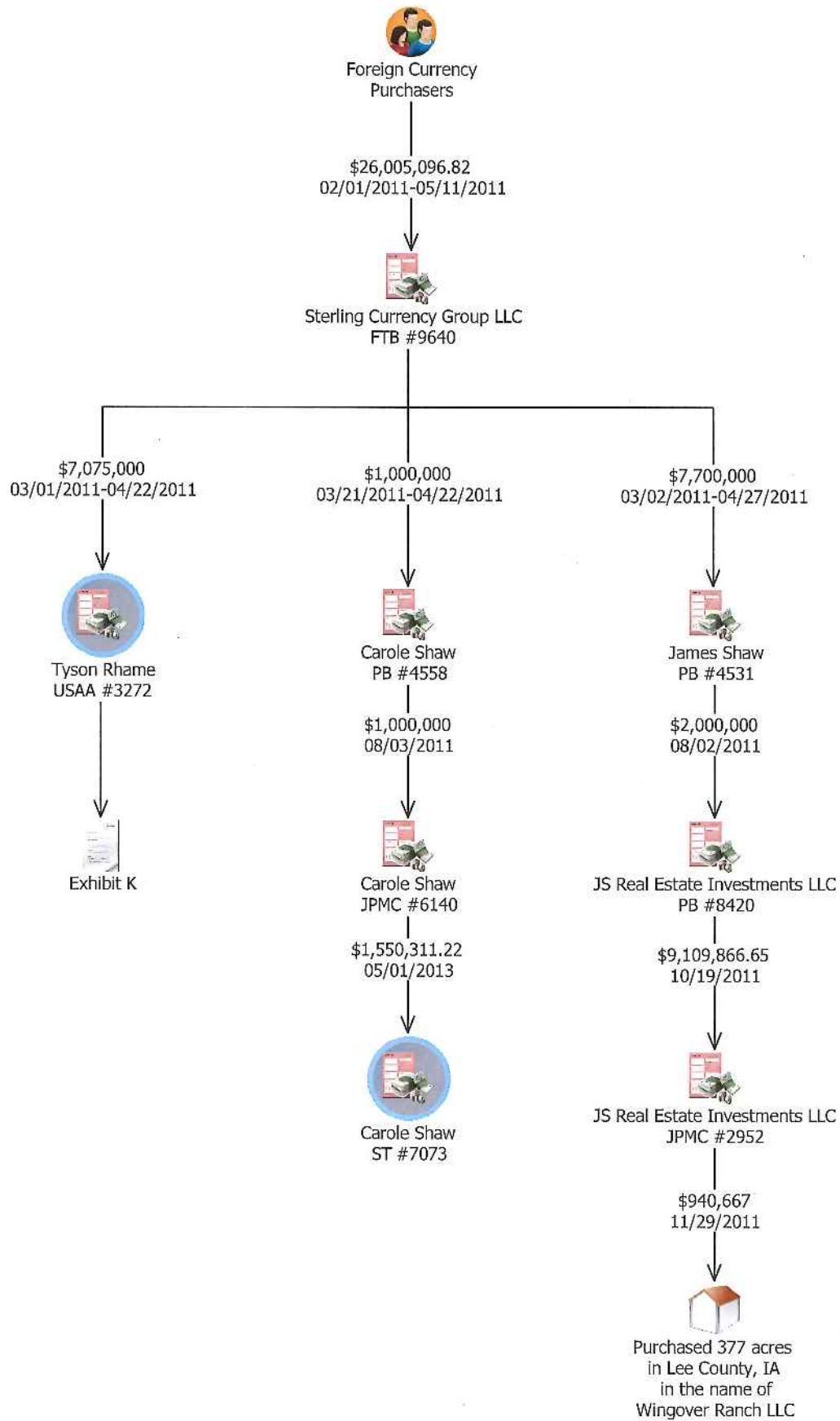


Exhibit B

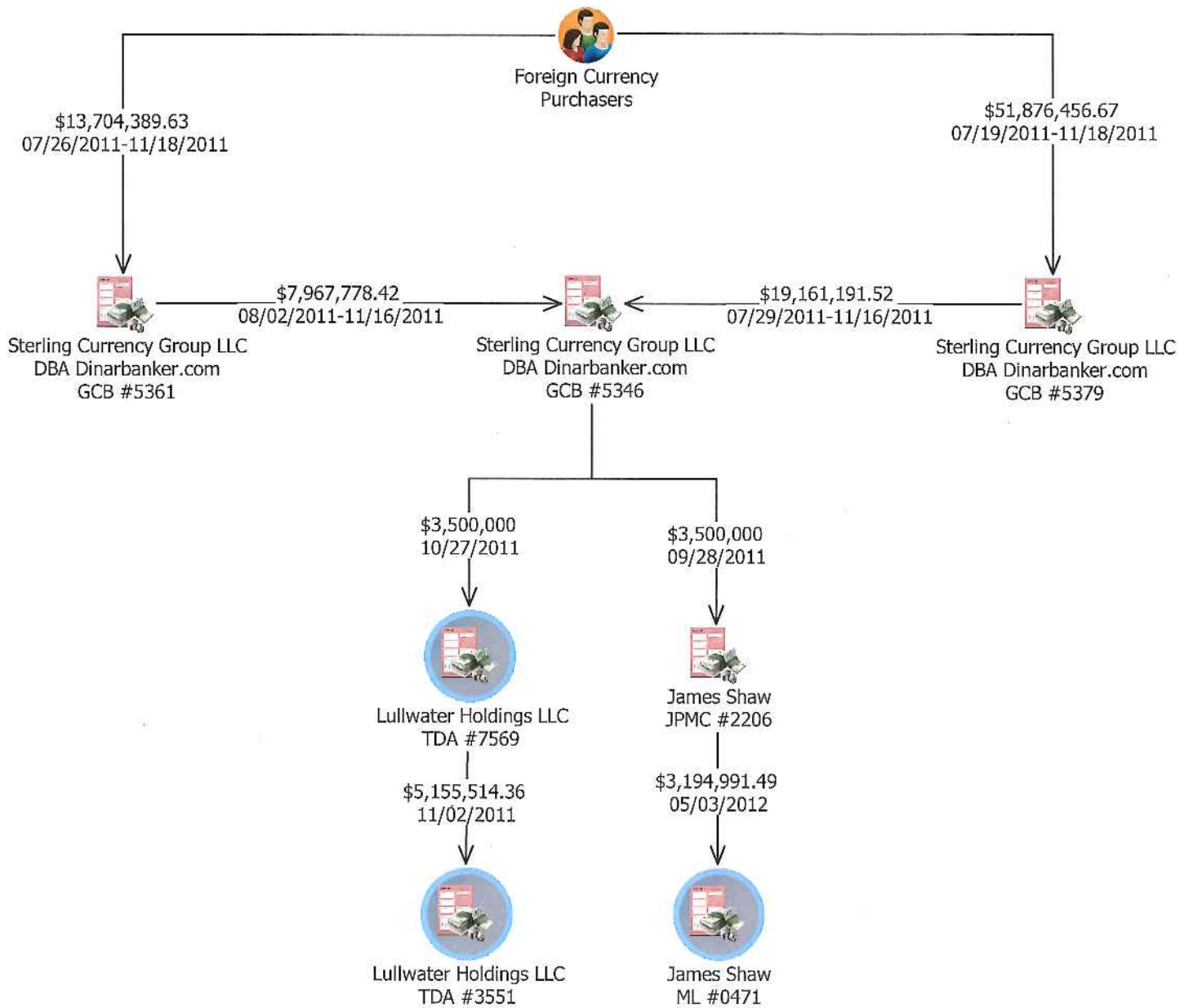
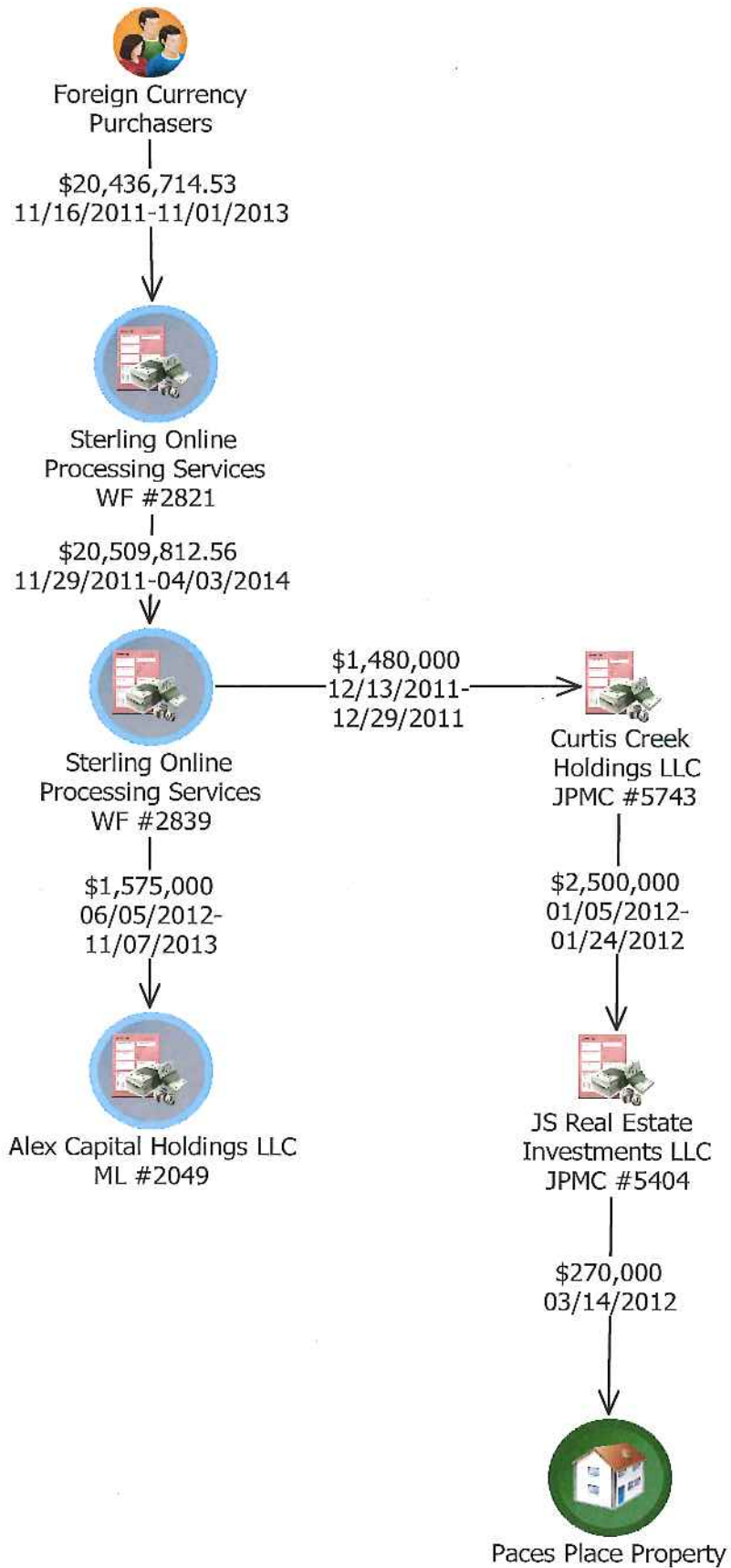
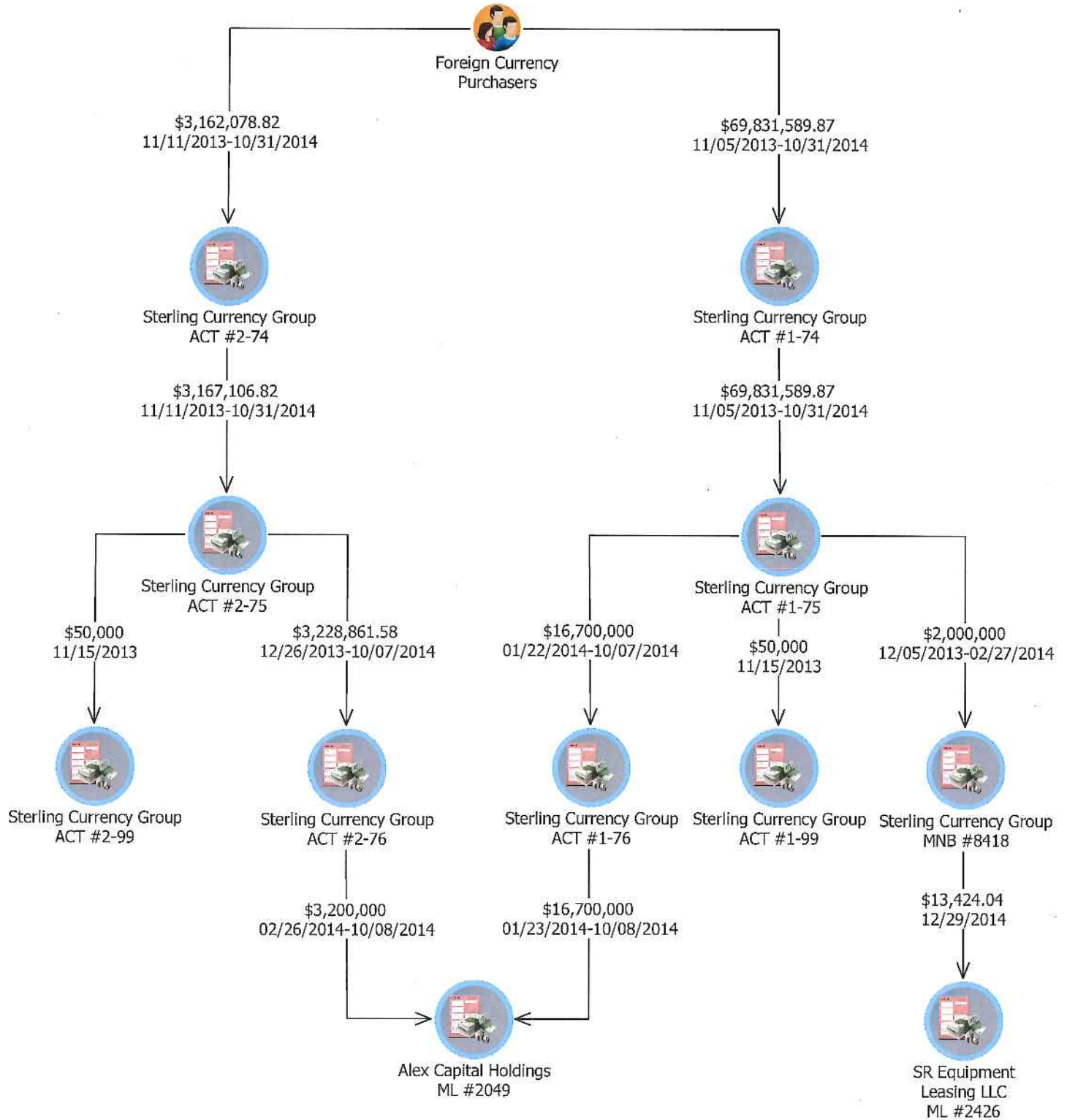


Exhibit C

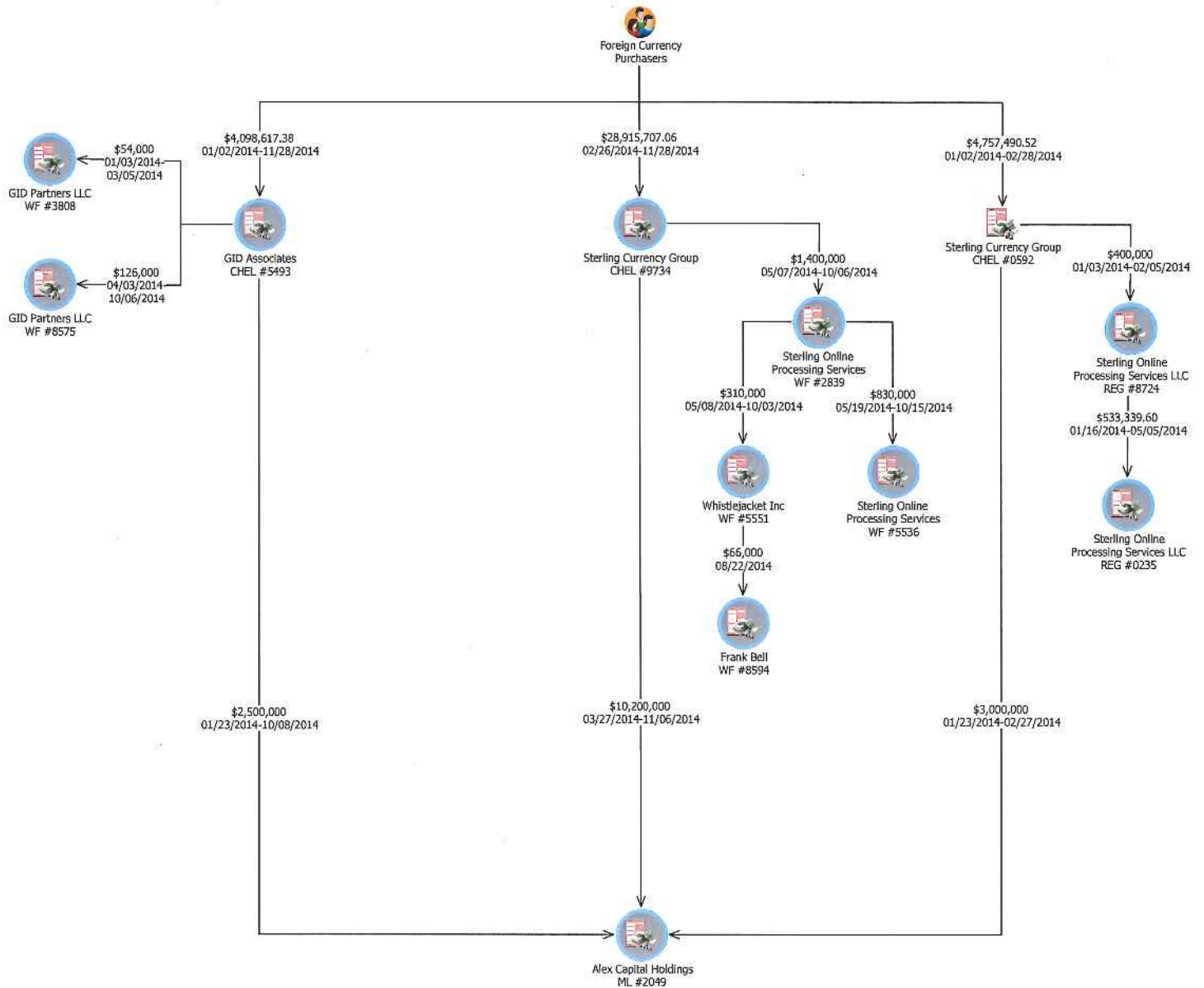


## Exhibit D

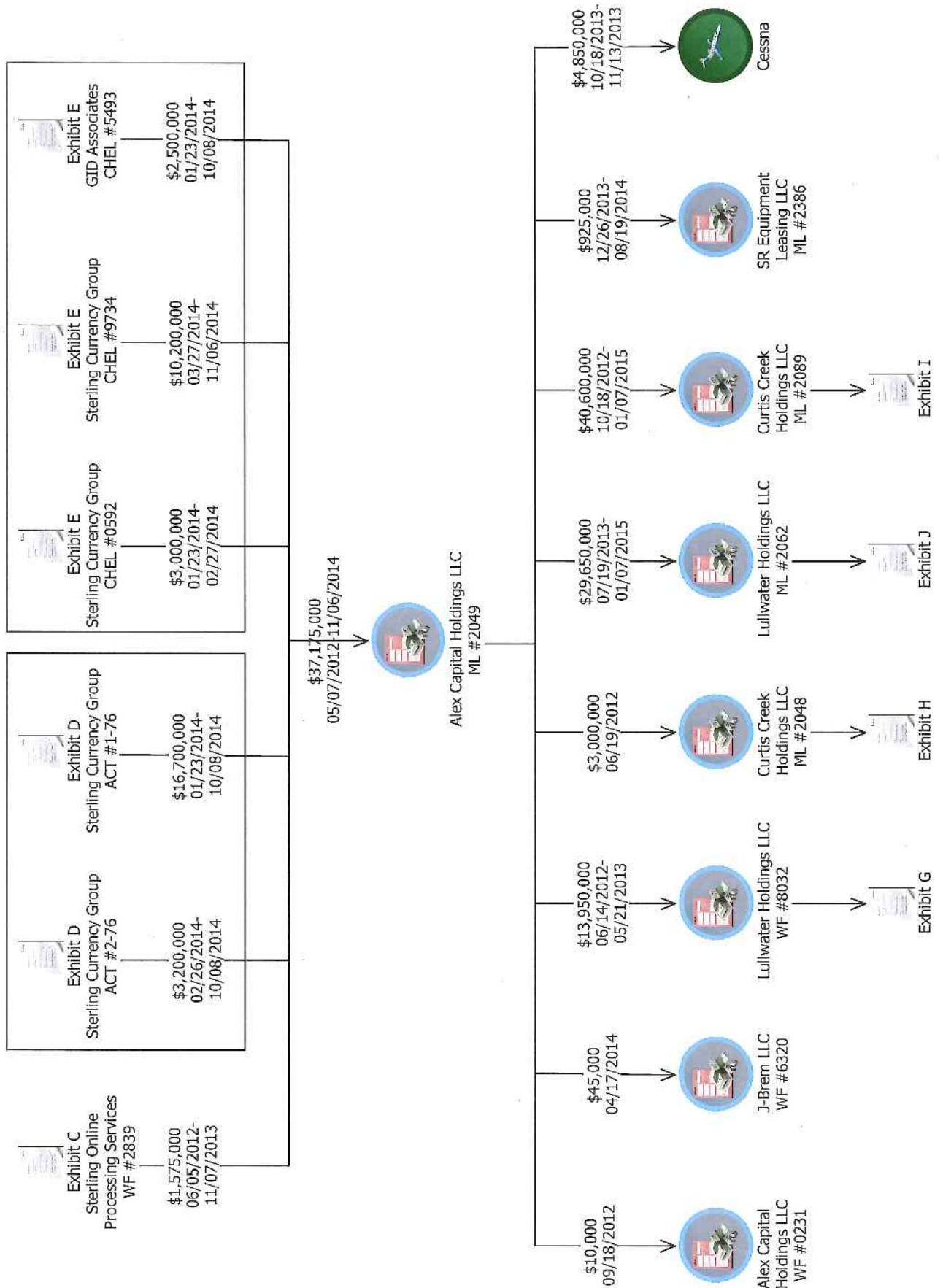




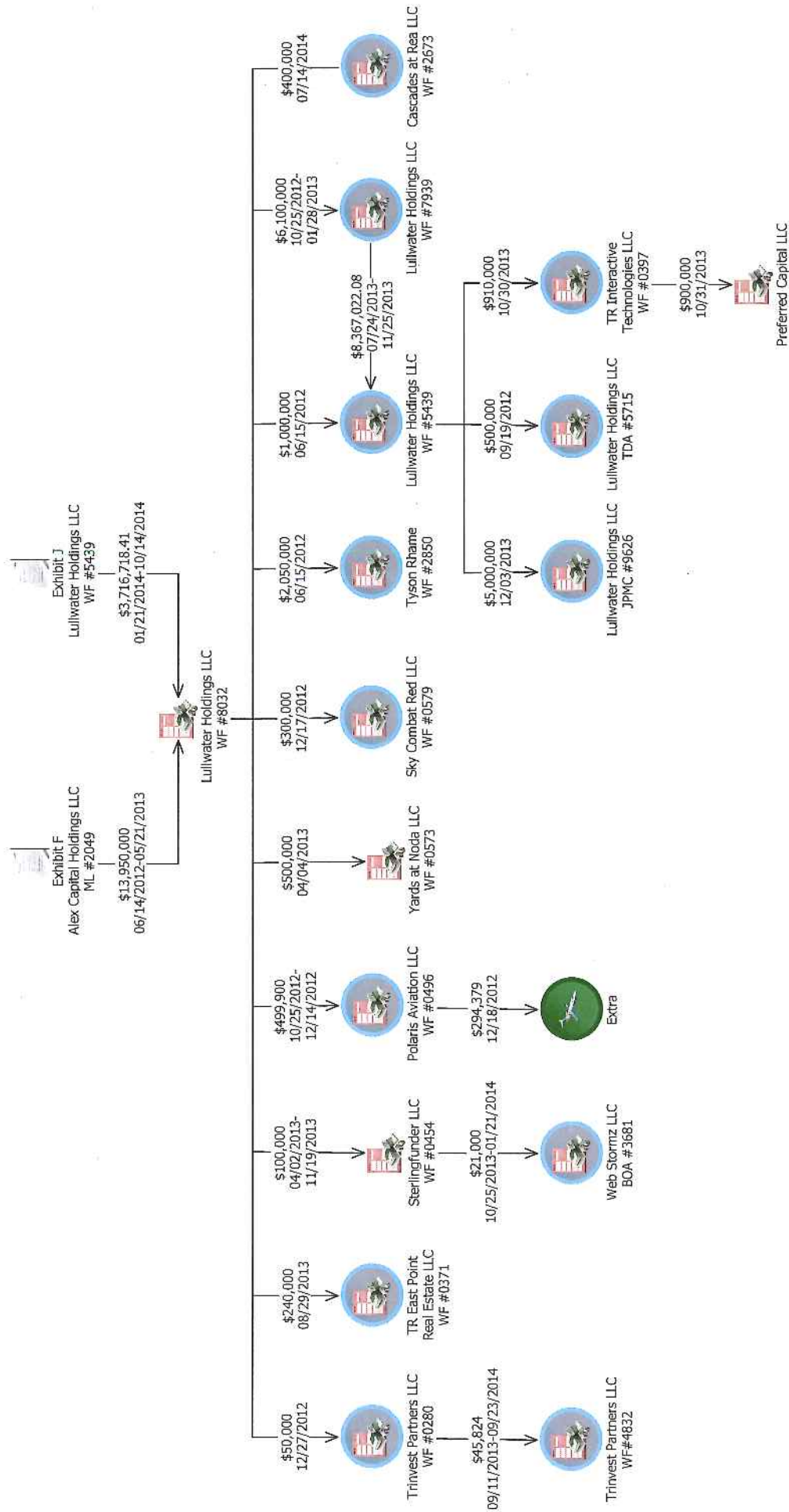
## Exhibit E



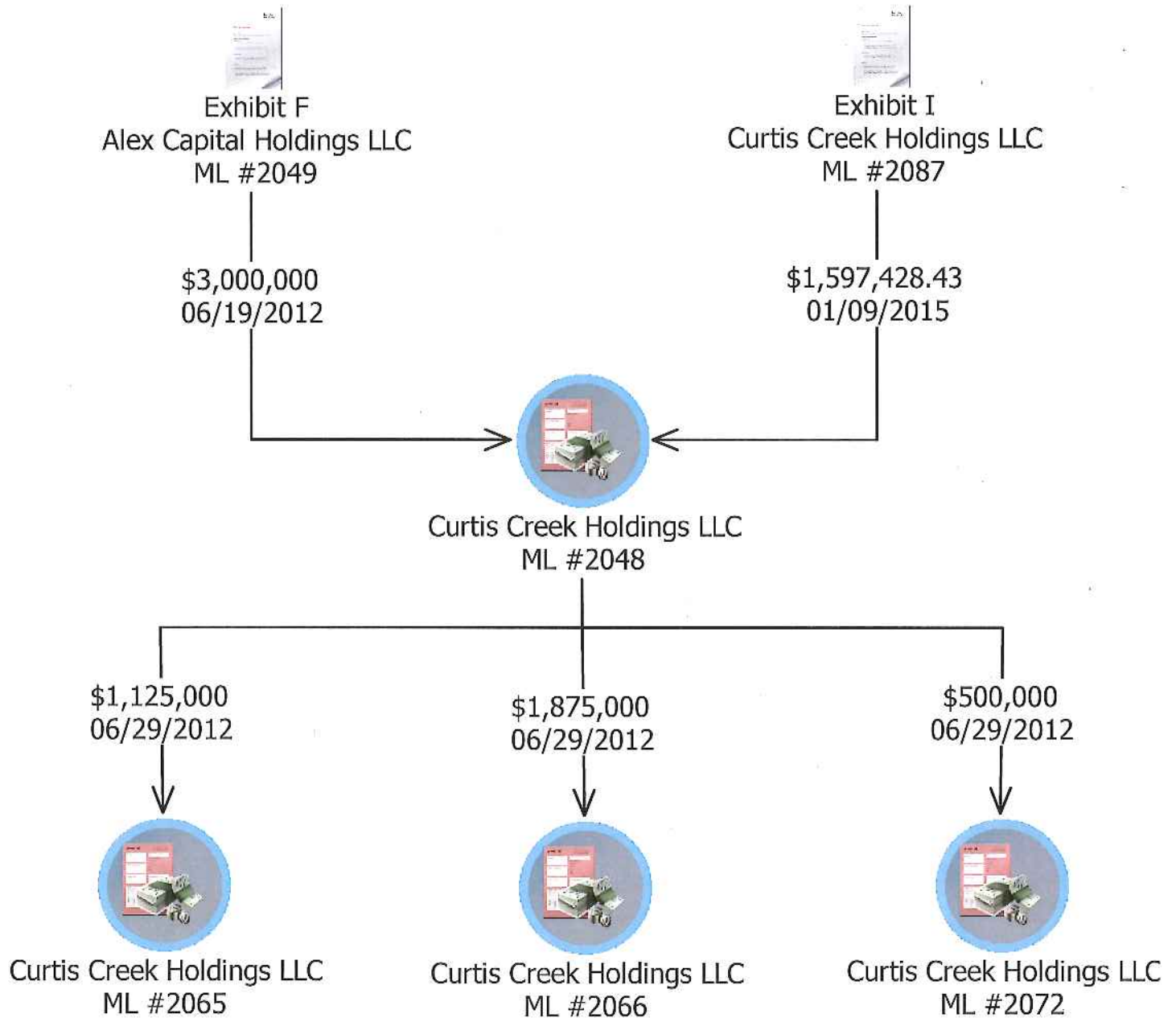
## Exhibit F

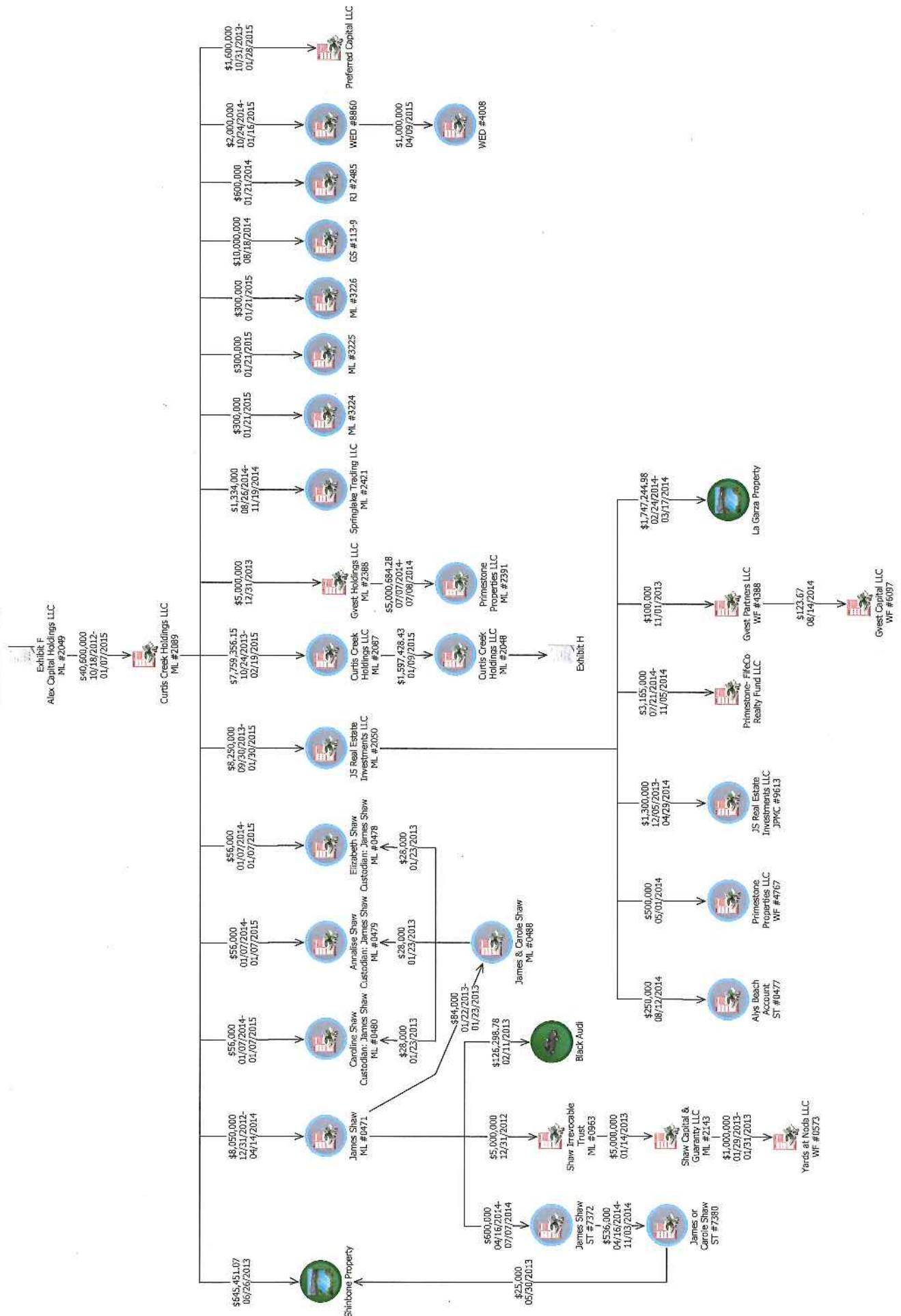


## Exhibit G



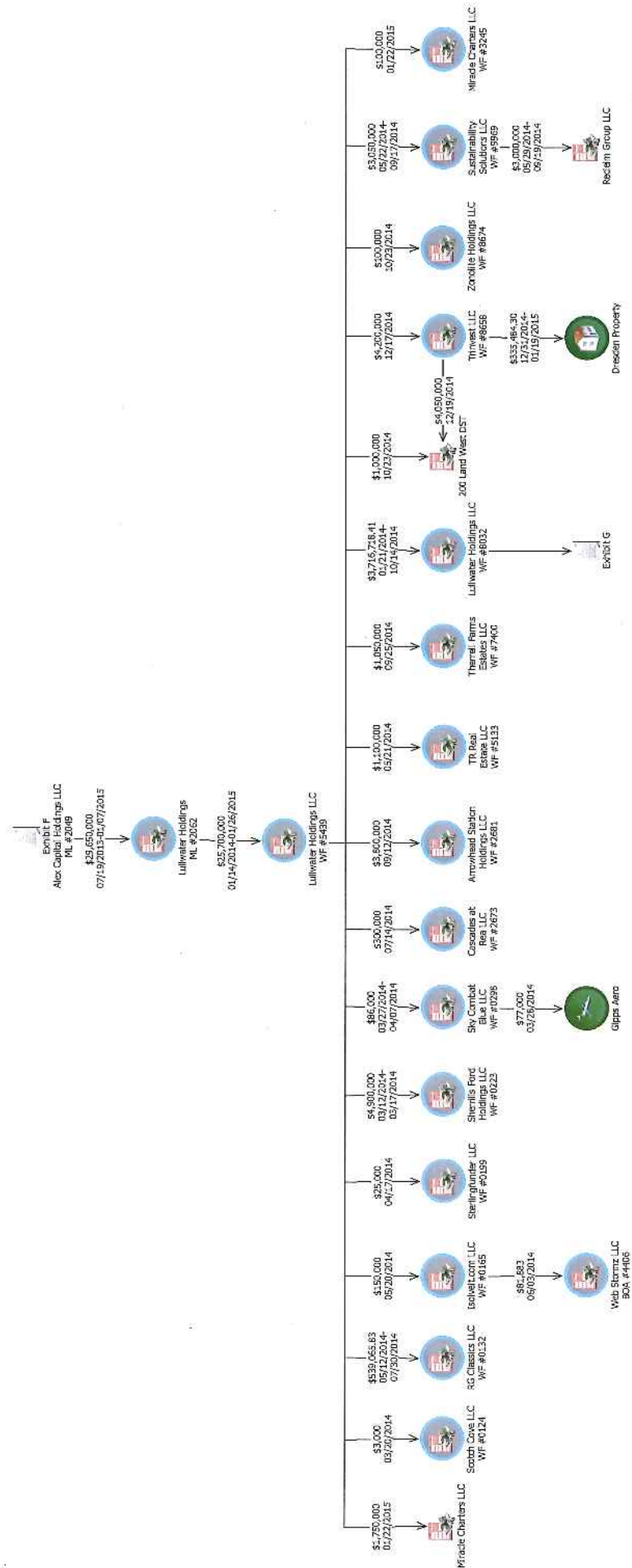
## Exhibit H







## Exhibit J



## Exhibit K

